

EPA Reg. Jacket 69361-10 vol 4

21-Day Screen of Amendment
(Completed by Contractor)

21-day Expires on 7-1-11

Document Part Of: 69361-10
MRID, If Any: 485056

Content Screen: Recommended to
Pass/Fail

86-5 Review: Passed/Failed/NA

Overall Status: Pass/Fail

Document returned to:

STEPHEN SETHAIDLE-
PM-21

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: JUL 29 2008		EPA Reg. Number: 69361-10		
	Check List Item	Yes	No	N/A
1	Has the PRIA Fee been Paid ; is a copy of the check or Pay.gov receipt included in the Submission Package? (FW)	X		
2	Is an Application Form (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a Confidential Statement of Formula (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a Formulator's Exemption Statement (EPA Form 8570-27) Included in the Submission Package?			
5	Is a Certification with Respect to Citation of Data (EPA Form 8570-34) Included in the Submission Package?	X		
6	Is a Data Matrix (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a Label Included in the Submission Package?	X		
8	Are Data Included in the Submission Package?			
9	Is the Submission an Amendment?			

Material Sent for Data Extraction

Reg. # 69361-10

Description: Revised label

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 10-31-11

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: 447625

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: ROBERT WESTIN

Phone: 305-5721 Division: RD/FB

Date: Nov 1, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Repar Corporation
% N. Bushan Mandava
Mandava Associates, LLC
1730 M Street N.W., Suite 906
Washington, DC 20036-4510

OCT 31 2011

Product Name: Tebuconazole Technical
EPA Reg. No.: 69361-10
Subject: Your amendment dated September 12, 2011
EPA Decision Number: 447625

Dear Dr. Mandava:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. On page 1, express the Net Contents in avoirdupois pounds and ounces (40 CFR 156.10(d)(3), and place the metric measurement within parenthesis.
2. Put the **STORAGE AND DISPOSAL** instructions into a text box to set them off from the rest of the label.
3. Change the CONTAINER DISPOSAL instructions to read:

"Plastic Bags: Nonrefillable container. Do not reuse or refill this bag. Completely empty bag into the processing equipment. Offer empty bag for recycling if available. Dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

22.5 kg Plastic Pails: Nonrefillable container. Do not reuse or refill this container. Completely empty container into the processing equipment. Triple rinse or pressure rinse container promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times."

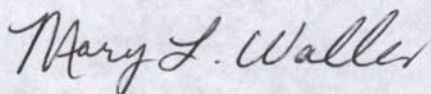
Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Offer empty container for recycling if available. Otherwise, puncture empty container and dispose in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke."

One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7504P)

Enclosure

TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4-triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible. • Call a poison control center or physician for treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Call a physician or poison control center immediately for treatment advice • Have person sip a glass of water if able to swallow. • DO NOT induce vomiting unless told to do so by a poison control center or physician. • Do not give anything by mouth to an unconscious person.
If on skin or: clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or physician for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye • Call a poison control center or physician for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: No specific antidote is available. Treat symptomatically.	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

ACCEPTED
with **COMMENTS**
In EPA Letter Dated

10/31/2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

69361-10

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board of Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Asparagus, Bananas, Plantains, Barley, Beans, Cherries, Corn, Cotton, Cucurbit Vegetables Crop, Grasses Grown for Seed; Onion, bulb, crop subgroup 3-07A; Onion, green, crop subgroup 3-07B; Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Okra, Fruit Nuts, Nectarines, Peaches, Grapes, Oats, Pecans, Peanuts, Pistachios, Soybean, Sunflower, Turnips, Wheat.

Terrestrial Food Crops – Seed Treatment: Barley, Corn and Wheat.

Terrestrial Food Crops – Foliar Treatment: Asparagus, Barley, Beans, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed; Onion, bulb, crop subgroup 3-07A; Onion, green, crop subgroup 3-07B; Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Okra, Pecans, Peanuts, Soybean, Sunflower, Turnips, Wheat

Terrestrial Non-Food Crops: Azaleas, Camellias, Rhododendrons, Landscape Trees and Shrubs, Hibiscus, Iris, Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Turfs, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products and wood products intended for above ground and in-ground systems.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such uses.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.





Question about Tebuconazole Technical packaging

Robert Westin to: Bhushan Mandava

Bcc: Robert Westin

09/14/2011 11:38 AM

re: EPA Reg No 69361-10
EPA Decision Number 447625

Hi Bushan: Is this product shipped in plastic bags, in rigid plastic containers, or in rigid containers with plastic bag liners?

Robert Westin

U.S. Environmental Protection Agency
OPP/RD/FB

phone: 703-305-5721

FAX: 703-305-6920

email: westin.robert@epamail.epa.gov

9-14-11 12:25

phone call from Bushan.

25 kg ⁱⁿ plastic drums

larger amounts in plastic bags (Super Packs)

RWester



RE: Repar Tebuconazole Technical - required label changes

Bhushan Mandava

to:

Robert Westin

09/12/2011 05:07 PM

Cc:

"Bhushan Mandava", "Bhushan Mandava"

Hide Details

From: "Bhushan Mandava" <bhushan@Mandava.com>

To: Robert Westin/DC/USEPA/US@EPA

Cc: "Bhushan Mandava" <bhushan@Mandava.com>, "Bhushan Mandava" <mandava@compuserve.com>

5903216

1 Attachment



TEBUCONAZOLE TECHNICAL - AMENDED LABEL (09-12-11).pdf

Dear Bob:

We are sending you an updated label for Tebuconazole Technical (EPA Reg. No. 69361-10) as a PDF file with changes you have recommended.

Thank you for your assistance in this matter.

Best Regards,

N. Bhushan Mandava
Mandava Associates, LLC
1050 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036
Tel: (202) 223 - 1424
Fax: (202) 223 - 0141

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Notice: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error and then delete it. Thank you.
.....

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [mailto:Westin.Robert@epamail.epa.gov]

Sent: Monday, September 12, 2011 3:17 PM

To: Bhushan Mandava

Subject: Repar Tebuconazole Technical - required label changes

re: Your amendment dated June 22, 2011
EPA Reg No 69361-10
EPA Decision Number 447625

Hi Bushan:

In the Terrestrial Food Crops table delete Eschalots, Garlic, Onions, Shallots, Scallions, Leeks and add "Onion, bulb, crop subgroup 3-07A; Onion, green, crop subgroup 3-07B;"

In the Terrestrial Food Crops - Foliar Treatment table delete Onions, Shallots, Scallions, Leek and add "Onion, bulb, crop subgroup 3-07A; Onion, green, crop subgroup 3-07B;"

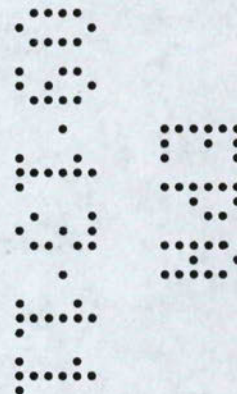
Please email me a .pdf file of the revised label.



Please phone me if you have any questions.

Robert Westin

U.S. Environmental Protection Agency
OPP/RD/FB
phone: 703-305-5721
FAX: 703-305-6920
email: westin.robert@epamail.epa.gov





Repar Tebuconazole Technical - required label changes

Robert Westin to: Bhushan Mandava

Bcc: Robert Westin

09/12/2011 03:17 PM

re: Your amendment dated June 22, 2011
EPA Reg No 69361-10
EPA Decision Number 447625

Hi Bushan:

In the Terrestrial Food Crops table delete Eschalots, Garlic, Onions, Shallots, Scallions, Leeks and add "Onion, bulb, crop subgroup 3-07A; Onion, green, crop subgroup 3-07B;"

In the Terrestrial Food Crops - Foliar Treatment table delete Onions, Shallots, Scallions, Leek and add "Onion, bulb, crop subgroup 3-07A; Onion, green, crop subgroup 3-07B;"

Please email me a .pdf file of the revised label.

Please phone me if you have any questions.

Robert Westin

U.S. Environmental Protection Agency
OPP/RD/FB

phone: 703-305-5721

FAX: 703-305-6920

email: westin.robert@epamail.epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 28, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES, LLC
REPAR CORP
1050 CONN. AVE., N.W., SUITE 1000
WASHINGTON, DC 20036

PRODUCT NAME: TEBUCONAZOLE TECHNICAL
COMPANY NAME: REPAR CORP
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 69361-10
EPA RECEIPT DATE: 06/27/11

D447625

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 21, at (703) 308-9354.

Sincerely,

P. E. Macke

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

M
{898548^~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 21

Receipt No.

S-

898548

EPA File Symbol/Reg. No.

69361-10

Pin-Punch Date:

6/27/2011

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *[Signature]*

Date: 6-28-11

Remarks:

PM-21 (FB)

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: Schaefer 7/1/11

EPA Reg. Number: 69361-10

EPA Receipt Date: 6/27/11

	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) - signed?	✓		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?			✓
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?	✓		
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			✓
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]	✓		
	a) Selective Method?	✓		
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5	✓		
6	Is Label Included? (5 copies)	✓		
	Comments:			



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 69361-10	2. EPA Product Manager Mary Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Repar Corporation/TEBUCONAZOLE TECHNICAL	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Repar Corporation P.O. Box 4321 Silver Spring, MD. 20914 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

- 1) This application is for the amended labeling for TEBUCONAZOLE TECHNICAL (EPA Reg. No. 69361-10) and adding additional uses.
- 2) Submittal of the Certification with Respect to Citation of Data (EPA Form 8750 -34) and Data Matrix (EPA Form 8570 - 35).
- 3) FAST TRACK and EXPEDITED REVIEW
- 4) Please direct all correspondence to: Mandava Associates, LLC; 1050 Connecticut Avenue, NW / Suite 1000; Washington, D.C. 20036
- 5) The contact person fax number is (202) 223 - 0141 and e-mail address is: mandava@compuserve.com.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.		No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name N. Bhushan Mandava		Title Agent for Repar Corporation		Telephone No. (Include Area Code) (202) 223-1424	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature N. Bhushan Mandava		3. Title Agent for Repar Corporation			
4. Typed Name N. Bhushan Mandava		5. Date June 22, 2011			

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1050 Connecticut Avenue, N.W., Suite 1000, WASHINGTON, DC 20036-4510

Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: mandava@compuserve.com

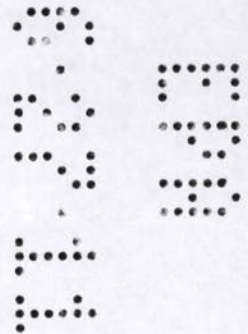
HAND DELIVERED

~~5903215~~

June 24, 2011

Ms. Mary L. Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

5903215



SUBJECT:	Submission:	Label Amendment
	Product Name:	Tebuconazole Technical
	Active Ingredient:	Tebuconazole
	Company:	Repar Corporation
	EPA Reg. No.:	69361-10

Dear Ms. Waller:

This is to notify the EPA that we are submitting a Label Amendment for Tebuconazole Technical (EPA Reg. No.: 69361-10). The product label is amended to include additional uses for terrestrial food crops, terrestrial food crops-seed treatment, terrestrial food crops – foliar treatment which cover all of the uses on our approved end use products.

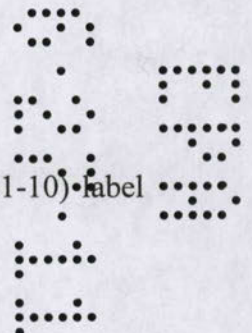
We are providing you some background on the Tebuconazole Technical label:

- 1) On June 24, 2008, we submitted a label amendment to your Branch and was approved on June 26, 2008 for the additional uses of Barley and Wheat (see Attachment 1).
- 2) On October 6, 2008 we submitted separate label amendments for Tebuconazole Technical (EPA Reg. No.: 69361-10) and Tebucon 3.6F (EPA Reg. No. 69361-11) for additional uses that were added to the Tebucon 3.6F label (Attachment 2).
 - a. The EPA approved the label amendment for Tebucon 3.6F on March 11, 2009.
 - b. We did not receive any correspondence regarding the submission for Tebuconazole Technical (EPA Reg. No. 69361-10) even though it was pin-punched on October 10, 2008 (Attachment 2).

- c. It was brought to our attention during a conference call with you on March 9, 2011 that the EPA did not act on the October 6, 2008 submission for amendment for the Tebuconazole Technical (EPA Reg. No. 69361-10) because we did not submit the EPA Application Form (EPA Form 8570-1), Data Matrix forms (EPA Form 8570-35) and Certification with Respect to Citation of Data (EPA Form 8570-34).
 - d. In other words, we did not make two separate action items for the Tebuconazole Technical (EPA Reg. No. 69361-10) and Tebucon 3.6F (EPA Reg. No. 69361-11). We did not mention the 2 action items in the SUBJECT line of the cover letter to you. [We did not realize that we have to make two separate action items.]
 - e. In addition, we have received a letter dated March 7, 2011 (see item # 2) which indicates that the Agency received the October 6, 2008 and current submission of Repar Tebucon 45DF Fungicide (EPA Reg. No. 69361-18) for including additional uses to the technical product (Attachment 3).
 - f. As per your email correspondence of March 10, 2011, the Agency considers that our label amendment of October 6, 2008 is not considered as a submission.
 - g. On March 23, 2011 we submitted a full label amendment which also implemented the additional uses for the label amendment of Tebucon 45 DF (EPA Reg. No. 69361-18) (EPA Decision Number 444686).
 - h. On June 7, 2011 we requested the Agency to place on hold the Tebucon 45DF label amendment (Decision Number 444686) for various business reasons including the data compensation for additional crops.
 - i. At the time we submitted an amended label for the Tebuconazole Technical (Decision number 447625) with fewer uses as this was to correspond with the uses of the approved uses of the end use products and deleting the uses for the Tebucon 45 DF label amendment (Decision Number 444686).
 - j. The Agency has closed both Decision Numbers 444686 and 447625 as per the email of June 17, 2011 (Attachment 4).
- 3) We are now submitting the label amendment for the Tebuconazole Technical (EPA Reg. No. 69361-10) as a resubmission to cover all of the uses of the currently approved end use products.
- 4) As advised by your June 26, 2008 letter, we have revised the label in the **Directions for Use** under the **Terrestrial Non-Food** section to also delete the "and paint systems for in-film preservations including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodegradation."

We have included with this submission please find the following:

- 1. Application for Pesticide Registration Notification (EPA Form 8570-1)
- 2. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 3. Data Matrix (EPA Form 8570-35)
- 4. 5 copies of the amended label for Tebuconazole Technical (EPA Reg. 69361-10) label with the additional uses.



We request the Agency to please approve the amended label for Tebuconazole Technical at the earliest and your assistance in this matter would be greatly appreciated.

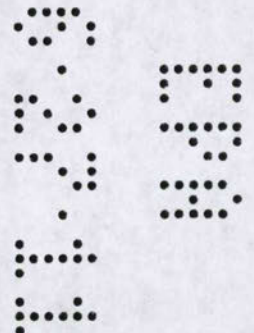
Thank you for your comments and assistance on this subject matter.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D.
Agent for Repar Corporation

Enclosures



Attachment 1

2020



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

ATTACHMENT 1

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Repar Corporation
% N. Bushan Mandava
Mandava Associates, LLC
1730 M Street N.W., Suite 906
Washington, DC 20036-4510

JUN 26 2008

Subject: Tebuconazole Technical
EPA Reg. No. 69361-10
Your amendment dated June 24, 2008
EPA Decision Number 369169

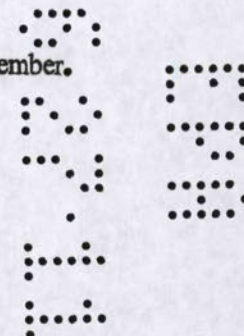
Dear Mr. Mandava:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided that you make the following change to the label:

In the **Directions for Use** under the heading **Terrestrial Non-Food**, delete "and paint systems for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodeterioration."

As a condition of registration, you must submit or cite data to satisfy the following data gaps in the timeframe specified below:

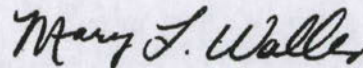
1. Submit barley field trial data from regions 10 and 11 (along with concurrent storage stability data on barley straw). Submission Due by: December 2011
2. Comply in the timeframe specified with the future Agency Data Call-in for all triazole-derivative active ingredients.
3. Submit a Whole Sediment Toxicity Study for benthic invertebrates. Submission due by: December 2011.
4. Submit Aerobic and Anaerobic Aquatic Metabolism Studies. Submission due by: December 2011.



EPA Reg. No.
Product Name
Page 2 of 2

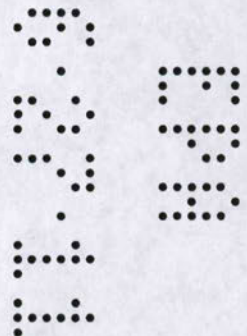
One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment. If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)

Enclosure



TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4-triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<p>! Move person to fresh air.</p> <p>! If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.</p> <p>! Call a poison control center or physician for treatment advice.</p>
If swallowed:	<p>! Call a physician or poison control center immediately for treatment advice</p> <p>! Have person sip a glass of water if able to swallow.</p> <p>! DO NOT induce vomiting unless told to do so by a poison control center or physician.</p> <p>! Do not give anything by mouth to an unconscious person.</p>
If on skin or clothing	<p>! Take off contaminated clothing.</p> <p>! Rinse skin with plenty of water for 15-20 minutes.</p> <p>! Call a poison control center or physician for treatment advice.</p>
If in eyes:	<p>! Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.</p> <p>! Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye</p> <p>! Call a poison control center or physician for treatment advice.</p>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p>Note to Physician: No specific antidote is available. Treat symptomatically.</p>	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

ACCEPTED
with COMMENTS
In EPA Letter Dated:
6/26/2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

69361-10

PRECAUTIONARY STATEMENTS **Hazards to Humans and Domestic Animals**

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board of Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Bananas, Plantains, Cherries, Nectarines, Peaches, Grapes, Oats, Peanuts, and Grasses grown for seed.

Terrestrial Food Crops - Seed Treatment: Barley and Wheat

Terrestrial Food Crops - Foliar Treatment: Barley and Wheat

Terrestrial Non-Food Crops: Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products, wood products intended for above ground and in-ground contact, plastics, coatings, and paint systems for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodeterioration.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such use.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

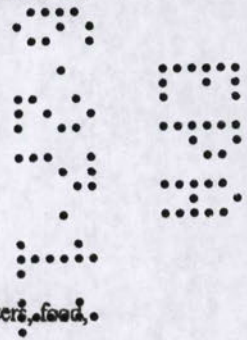
Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

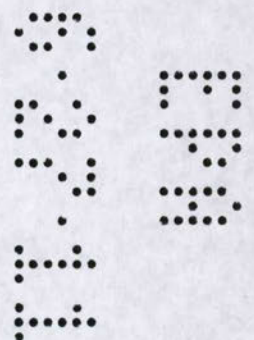
Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, feed, etc.



and feed. Store in original container and out of the reach of children, preferably in a locked storage area.



Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

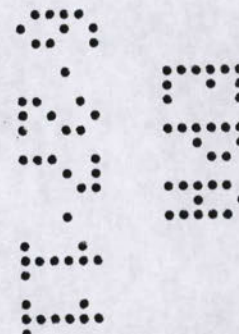
CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. The dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

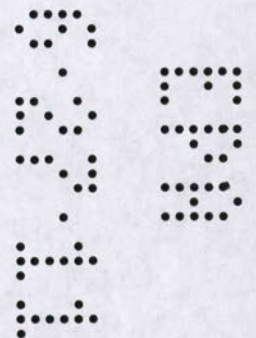
CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.



Attachment 2



MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 Connecticut Avenue, N.W., Suite 1000, WASHINGTON, DC 20036-4510
Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: Mandava@compuserve.com

October 6, 2008

Ms. Mary L. Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT:	Submission:	Amended Label
	Product Name:	Tebucon 3.6F Fungicide
	Active Ingredient:	Tebuconazole
	Company:	Repar Corporation
	EPA File Symbol:	69361-11

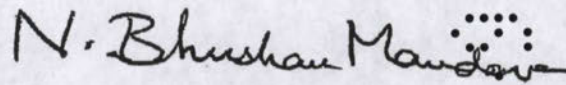
Dear Ms. Waller:

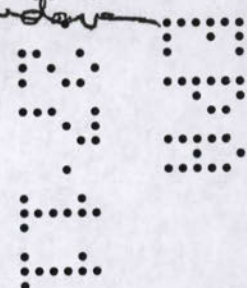
This is to notify the EPA that we are submitting 5 copies of the Amended Label for Tebucon 3.6F Fungicide (EPA Reg. No.: 69361-11). The product label was amended to include additional uses for terrestrial food crops, terrestrial food crops- seed treatment, and terrestrial food crops – foliar treatment.

As advised by your June 26, 2008 letter, we have revised the Tebuconazole Technical (EPA Reg. No.: 69361-10) label in the **Directions for Use** under the **Terrestrial Non-Food**, we have deleted “and paint systems for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodegradation.”

Thank you for your comments and assistance on this subject matter.

Sincerely,


N. Bhushan Mandava, Ph.D.
Agent for Repar Corporation



Enclosures

TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl- α -(1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol] 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<ul style="list-style-type: none"> o Move person to fresh air. o If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible. o Call a poison control center or physician for treatment advice.
If swallowed:	<ul style="list-style-type: none"> o Call a physician or poison control center immediately for treatment advice o Have person sip a glass of water if able to swallow. o DO NOT induce vomiting unless told to do so by a poison control center or physician. o Do not give anything by mouth to an unconscious person.
If on skin or: clothing	<ul style="list-style-type: none"> o Take off contaminated clothing. o Rinse skin with plenty of water for 15-20 minutes. o Call a poison control center or physician for treatment advice.
If in eyes:	<ul style="list-style-type: none"> o Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes. o Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye o Call a poison control center or physician for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: No specific antidote is available. Treat symptomatically.	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

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Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Asparagus, Bananas, Plantains, Barley, Beans, Cherries, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Mango, Okra, Fruit Nuts, Nectarines, Peaches, Grapes, Oats, Peanuts, Pistachios, Soybean, Sunflower, Turnips, Wheat.

Terrestrial Food Crops - Seed Treatment: Barley, Corn and Wheat.

Terrestrial Food Crops - Foliar Treatment: Asparagus, Barley, Beans, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Mango, Okra, Fruit Nuts, Peanuts, Soybean, Sunflower, Turnips, Wheat

Terrestrial Non-Food Crops: Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products and wood products intended for above ground and in-ground systems.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such uses.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

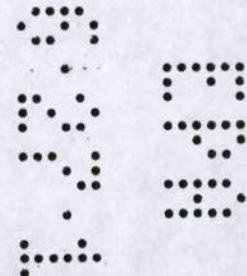
Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.



Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

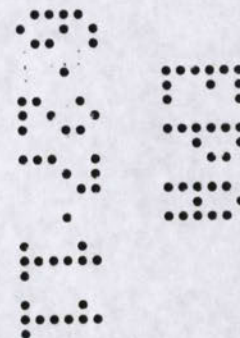
CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.



Attachment 3

33



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ATTACHMENT 3

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAR 7 2011

Mr. N. Bhushan Mandava
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

Subject: Tebucon 45 DF Fungicide
EPA Reg. No. 69361-18
Decision Number 444686
Your submission dated January 19, 2011

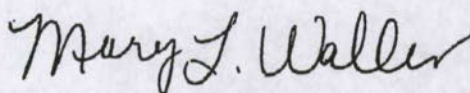
Dear Mr. Mandava:

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is not acceptable for the following reasons:

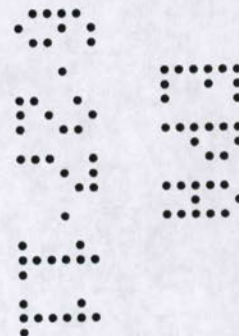
- 1) The last stamped label that the Agency has on file for the source of active ingredient in your product is dated June 26, 2008. The uses on the source label do not include the uses that you are proposing. Please ensure that the uses you wish to add to your product label are approved uses on your source product label. You must also submit a revised data matrix that addresses the specific data requirements for the added uses.
- 2) Additionally, it would appear that you have tried adding uses to the technical product by including "revised labels" in the submissions for other products, specifically in your letter of October 6, 2008 for EPA Reg. No. 69361-11 and with the present submission (EPA Reg. No. 69361-18, letter dated January 19, 2011). This is not acceptable. If you are updating the label for the technical product to include additional uses you must do so in a separate submission and address the data requirements for those additional uses.
- 3) As part of the new 40CFR §158 Guidelines, an immunotoxicity study in rats and/or mice is required. You must submit or cite this study by April 2012.

Please submit the required information listed above. If you have any questions, please contact Tracy Keigwin of my team by phone at 703-305-6605 or via email at keigwin.tracy@epa.gov.

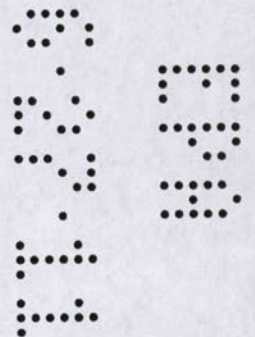
Sincerely,




Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)



ATTACHMENT 4




ATTACHMENT 4

 You forwarded this message on 6/18/2011 2:37 PM.

Attachments can contain viruses that may harm your computer. Attachments may not display correctly.

Bhushan Mandava

From: Keigwin.Tracy@epamail.epa.gov [Keigwin.Tracy@epamail.epa.gov]
To: Bhushan Mandava
Cc: Waller.Mary@epamail.epa.gov; Srinivas Mandava, M.D.
Subject: RE: Tebuconazole Amendments
Attachments:  TEBUCONAZOLE TECHNICAL - AMENDED LABEL (06-06-11).pdf(113KB)

Sent: Fri 6/17/2011 12:09 PM

Hi Dr. Mandava,

Please forgive the tardiness of my reply. Mary and I have thought about and discussed your e-mail at length.

1) With regard to 69361-18, decision 444686 - unfortunately this is unacceptable. It is not possible for us to put an action on hold until other issues are resolved. Additionally, we can't stamp the label for an action which we previously found unacceptable, as was stated in our 5/7/11 correspondence. When making a resubmission please submit the appropriate documentation again, including a new set of labels. If issues arise in the future in connection with a submission, we would request that you withdraw the submission until the issues are resolved and resubmit it then. This action is now closed out and any response will be considered a resubmission.

2) With regard to 69361-10, decision 447625, this is also unacceptable. Your technical needs to cover all of the uses that appear on your end use products. We would additionally like to know why you have chosen to drop uses that appear with your 3/23/11 submission in favor of the fewer uses on your revised label that was submitted on 6/7/11 (below). This action is now closed out and any response will be considered a resubmission.

Dr. Mandava, unfortunately I am out of the office for the rest of the day and only in sporadically next week. If you have any further questions can you please e-mail them to Mary and I? That will let me get back to you in a more timely manner.

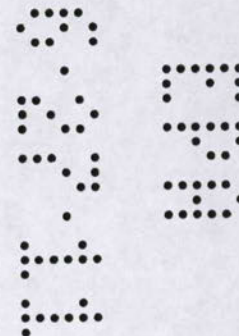
Thanks,
Tracy

Tracy Keigwin
 Fungicides Branch
 Registration Division
 Office of Pesticide Programs
 US Environmental Protection Agency
 Phone: (703) 305-6605
<http://www.epa.gov/pesticides>

From: "Bhushan Mandava" <mandava@compuserve.com>
 To: Tracy Keigwin/DC/USEPA/US@EPA
 Cc: "Srinivas Mandava, M.D." <Srini@Mandava.com>, Mary Waller/DC/USEPA/US@EPA
 Date: 06/07/2011 04:21 PM
 Subject: RE: Tebuconazole Amendments

Dear Tracy:

This is a follow up to your email from June 3, 2011 and a follow-up on our 2 label amendments for Repar Corporation for



Tebuconazole Technical (EPA Reg. No. 69361-10) and Tebucon 45DF (EPA Reg. No.: 69361-18). At this time we would like to request you to act on the following:

- 1) Tebucon 45 DF (EPA Reg. No. 69361-18): We would like to request the Agency to place this label amendment on hold until some internal decisions are made regarding which way Repar Corporation would like to proceed on this subject matter.
- 2) Tebuconazole Technical (EPA Reg. No. 69361-10): We request the Agency to use the amended label for the subject product that is attached to this email instead of the label that was submitted on March 23, 2011 which covers all currently registered end use products of Tebuconazole for Repar Corporation and deletes the additional uses for the label amendment that corresponded to Tebucon 45DF (EPA Reg. No. 69361-18).

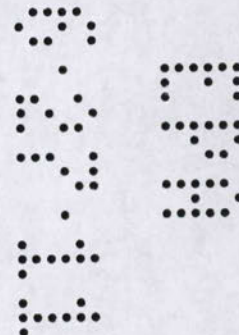
Thank you for your time and assistance in this matter.

Best Regards,

N. Bhushan Mandava
Agent for Repar Corporation
Mandava Associates, LLC
1050 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036
Tel: (202) 223 - 1424
Fax: (202) 223 - 0141

Notice: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error and then delete it. Thank you.

(See attached file: TEBUCONAZOLE TECHNICAL - AMENDED LABEL (06-06-11).pdf)



TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4-triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible. • Call a poison control center or physician for treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Call a physician or poison control center immediately for treatment advice • Have person sip a glass of water if able to swallow. • DO NOT induce vomiting unless told to do so by a poison control center or physician. • Do not give anything by mouth to an unconscious person.
If on skin or: clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or physician for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye • Call a poison control center or physician for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: No specific antidote is available. Treat symptomatically.	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

Superseded 9-13-11

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board of Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Asparagus, Bananas, Plantains, Barley, Beans, Cherries, Corn, Cotton, Cucurbit Vegetables Crop, Eschalots, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Okra, Fruit Nuts, Nectarines, Peaches, Grapes, Oats, Pecans, Peanuts, Pistachios, Soybean, Sunflower, Turnips, Wheat.

Terrestrial Food Crops – Seed Treatment: Barley, Corn and Wheat.

Terrestrial Food Crops – Foliar Treatment: Asparagus, Barley, Beans, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Okra, Pecans, Peanuts, Soybean, Sunflower, Turnips, Wheat

Terrestrial Non-Food Crops: Azaleas, Camellias, Rhododendrons, Landscape Trees and Shrubs, Hibiscus, Iris, Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Turfs, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products and wood products intended for above ground and in-ground systems.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such uses.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

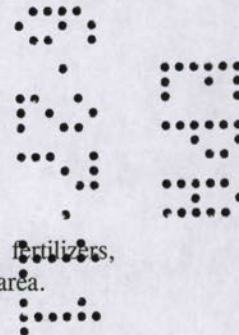
Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.



Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

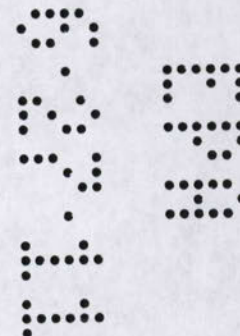
CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY


REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.



* close out of decision 447625



RE: Tebuconazole Amendments 
Tracy Keigwin to: Bhushan Mandava
Cc: Mary Waller, "Srinivas Mandava, M.D."

06/17/2011 12:09 PM

Hi Dr. Mandava,

Please forgive the tardiness of my reply. Mary and I have thought about and discussed your e-mail at length.

1) With regard to 69361-18, decision 444686 - unfortunately this is unacceptable. It is not possible for us to put an action on hold until other issues are resolved. Additionally, we can't stamp the label for an action which we previously found unacceptable, as was stated in our 5/7/11 correspondence. When making a resubmission please submit the appropriate documentation again, including a new set of labels. If issues arise in the future in connection with a submission, we would request that you withdraw the submission until the issues are resolved and resubmit it then. This action is now closed out and any response will be considered a resubmission.

2) With regard to 69361-10, decision 447625, this is also unacceptable. Your technical needs to cover all of the uses that appear on your end use products. We would additionally like to know why you have chosen to drop uses that appear with your 3/23/11 submission in favor of the fewer uses on your revised label that was submitted on 6/7/11 (below). This action is now closed out and any response will be considered a resubmission.

Dr. Mandava, unfortunately I am out of the office for the rest of the day and only in sporadically next week. If you have any further questions can you please e-mail them to Mary and I? That will let me get back to you in a more timely manner.

Thanks,
Tracy

Tracy Keigwin
Fungicides Branch
Registration Division
Office of Pesticide Programs
US Environmental Protection Agency
Phone: (703) 305-6605
<http://www.epa.gov/pesticides>

"Bhushan Mandava"

Dear Tracy:

06/07/2011 04:21:27 PM

From: "Bhushan Mandava" <mandava@compuserve.com>
To: Tracy Keigwin/DC/USEPA/US@EPA
Cc: "Srinivas Mandava, M.D." <Srini@Mandava.com>, Mary Waller/DC/USEPA/US@EPA
Date: 06/07/2011 04:21 PM
Subject: RE: Tebuconazole Amendments

Dear Tracy:

This is a follow up to your email from June 3, 2011 and a follow-up on our 2 label amendments for Repar Corporation for Tebuconazole Technical (EPA Reg. No. 69361-10) and Tebucon 45DF (EPA Reg. No.: 69361-18). At this time we would like to request you to act on the following:

- 1) Tebucon 45 DF (EPA Reg. No. 69361-18): We would like to request the Agency to place this label amendment on hold until some internal decisions are made regarding which way Repar Corporation would like to proceed on this subject matter.
- 2) Tebuconazole Technical (EPA Reg. No. 69361-10): We request the Agency to use the amended label for the subject product that is attached to this email instead of the label that was submitted on March 23, 2011 which covers all currently registered end use products of Tebuconazole for Repar Corporation and deletes the additional uses for the label amendment that corresponded to Tebucon 45DF (EPA Reg. No. 69361-18).

Thank you for your time and assistance in this matter.

Best Regards,

N. Bhushan Mandava
Agent for Repar Corporation
Mandava Associates, LLC
1050 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036
Tel: (202) 223 - 1424
Fax: (202) 223 - 0141

Notice: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error and then delete it. Thank you.



TEBUCONAZOLE TECHNICAL - AMENDED LABEL (06-06-11).pdf

Unacceptable

Page 1

TEBUCONAZOLE TECHNICAL
Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4--triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.• Call a poison control center or physician for treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call a physician or poison control center immediately for treatment advice• Have person sip a glass of water if able to swallow.• DO NOT induce vomiting unless told to do so by a poison control center or physician.• Do not give anything by mouth to an unconscious person.
If on skin or: clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin with plenty of water for 15-20 minutes.• Call a poison control center or physician for treatment advice.
If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye• Call a poison control center or physician for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: No specific antidote is available. Treat symptomatically.	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

New label submitted 6/7/11. Note that there are fewer uses than the original label sent with this submission.

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board of Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Asparagus, Bananas, Plantains, Barley, Beans, Cherries, Corn, Cotton, Cucurbit Vegetables Crop, Eschalots, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Okra, Fruit Nuts, Nectarines, Peaches, Grapes, Oats, Pecans, Peanuts, Pistachios, Soybean, Sunflower, Turnips, Wheat.

Terrestrial Food Crops – Seed Treatment: Barley, Corn and Wheat.

Terrestrial Food Crops – Foliar Treatment: Asparagus, Barley, Beans, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Okra, Pecans, Peanuts, Soybean, Sunflower, Turnips, Wheat

Terrestrial Non-Food Crops: Azaleas, Camellias, Rhododendrons, Landscape Trees and Shrubs, Hibiscus, Iris, Roses, Flowers, Ornamental trees, Groundcovers, Turfs, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products and wood products intended for above ground and in-ground systems.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such uses.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

* letter also discusses deficiencies
with 69361-10

Mr. N. Bhushan Mandava
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

MAR 7 2011

Subject: Tebucon 45 DF Fungicide
EPA Reg. No. 69361-18
Decision Number 444686
Your submission dated January 19, 2011

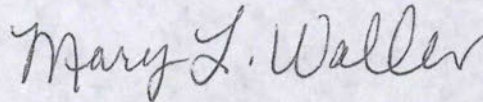
Dear Mr. Mandava:

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is not acceptable for the following reasons:

- 1) The last stamped label that the Agency has on file for the source of active ingredient in your product is dated June 26, 2008. The uses on the source label do not include the uses that you are proposing. Please ensure that the uses you wish to add to your product label are approved uses on your source product label. You must also submit a revised data matrix that addresses the specific data requirements for the added uses.
- 2) Additionally, it would appear that you have tried adding uses to the technical product by including "revised labels" in the submissions for other products, specifically in your letter of October 6, 2008 for EPA Reg. No. 69361-11 and with the present submission (EPA Reg. No. 69361-18, letter dated January 19, 2011). This is not acceptable. If you are updating the label for the technical product to include additional uses you must do so in a separate submission and address the data requirements for those additional uses. (69361-10)
- 3) As part of the new 40CFR §158 Guidelines, an immunotoxicity study in rats and/or mice is required. You must submit or cite this study by April 2012.

Please submit the required information listed above. If you have any questions, please contact Tracy Keigwin of my team by phone at 703-305-6605 or via email at keigwin.tracy@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mary L. Waller".

Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 24, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES, LLC
REPAR CORP
1050 CONN. AVE., N.W., SUITE 1000
WASHINGTON, DC 20036

PRODUCT NAME: TEBUCONAZOLE TECHNICAL
COMPANY NAME: REPAR CORP
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 69361-10
EPA RECEIPT DATE: 03/23/11

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 21, at (703) 308-9354.

Sincerely,

P. A. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{892602Æ~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 21

Receipt No.

S-

892602

EPA File Symbol/Reg. No.

69361-10

Pin-Punch Date:

3/23/2011



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

NON-FEE

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Kimberly

Date: 3/24/11

Remarks:

TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4-triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible. • Call a poison control center or physician for treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Call a physician or poison control center immediately for treatment advice • Have person sip a glass of water if able to swallow. • DO NOT induce vomiting unless told to do so by a poison control center or physician. • Do not give anything by mouth to an unconscious person.
If on skin or: clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or physician for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye • Call a poison control center or physician for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p>Note to Physician: No specific antidote is available. Treat symptomatically.</p>	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

** originally submitted label
superceded by 6/7/11 email label*

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board of Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Apple, Apricot, Asparagus, Bananas, Plantains, Barley, Beans, Cherries, Corn, Cotton, Crabapple, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Loquat, Lychee, Mayhaw, Mango, Okra, Fruit Nuts, Nectarines, Peaches, Pear, Pear Oriental, Plum, Plumcot, Prune (fresh), Quince, Grapes, Oats, Peanuts, Pistachios, Soybean, Sunflower, Tree Nuts, Turnips, Wheat.

Terrestrial Food Crops – Seed Treatment: Barley, Corn and Wheat.

Terrestrial Food Crops – Foliar Treatment: Asparagus, Barley, Beans, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Mango, Okra, Fruit Nuts, Peanuts, Soybean, Sunflower, Turnips, Wheat

Terrestrial Non-Food Crops: Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products and wood products intended for above ground and in-ground systems.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such uses.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

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CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 Connecticut Avenue, N.W., Suite 1000, WASHINGTON, DC 20036-4510
Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: mandava@compuserve.com

HAND DELIVERED

March 23, 2011

Ms. Mary L. Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT:	Submission:	Label Amendment
	Product Name:	Tebuconazole Technical
	Active Ingredient:	Tebuconazole
	Company:	Repar Corporation
	EPA Reg. No.:	69361-10

Dear Ms. Waller:

This is to notify the EPA that we are submitting a Label Amendment for Tebuconazole Technical (EPA Reg. No.: 69361-10). The product label was amended to include additional uses for terrestrial food crops, terrestrial food crops-seed treatment, terrestrial food crops – foliar treatment, Tree Nuts (almond, beechnut, brazil nut, butternut, cashew, chestnut, chinquapin, filbert, hickory nut, macadamia nut, pistachios, walnut), Pome fruits (apple, crabapple, loquat, mayhaw, pear, pear oriental, quince) and additional Stone Fruits (apricot, plum, plumcot, and prune (fresh)).

We are providing you some background on the Tebuconazole Technical label:

- 1) On June 24, 2008, we submitted a label amendment to your branch and was approved on June 26, 2008 for the additional uses of Barley and Wheat (see Attachment 1).
- 2) On October 6, 2008 we submitted separate label amendments for Tebuconazole Technical (EPA Reg. No.: 69361-10) and Tebucon 3.6F (EPA Reg. No. 69361-11) for additional uses that were added to the Tebucon 3.6F label (Attachment 2).
 - a. The EPA approved the label amendment for Tebucon 3.6F on March 11, 2009
 - b. We did not receive any correspondence regarding the submission for Tebuconazole Technical (EPA Reg. No. 69361-10) even though it was pin-

punched dated October 10, 2008 (Attachment 2).

- c. It was brought to our attention during a conference call with you on March 9, 2011 that the EPA did not act on the October 6, 2008 submission for amendment for the Tebuconazole Technical (EPA Reg. No. 69361-10) because we did not submit the EPA Application Form (EPA Form 8570-1), Data Matrix forms (EPA Form 8570-35) and Certification with Respect to Citation of Data (EPA Form 8570-34).
 - d. In other words we did not make two separate action items for the Tebuconazole Technical (EPA Reg. No. 69361-10) and Tebucon 3.6F (EPA Reg. No. 69361-11). We did not mention the 2 action items in the SUBJECT line of the cover letter to you.
 - e. In addition, we have received a letter dated March 7, 2011 (see item # 2) which indicates that the Agency received the October 6, 2008 and current submission of Repar Tebucon 45DF Fungicide (EPA Reg. No. 69361-18) for including additional uses to the technical product (Attachment 3).
 - f. As per your email correspondence of March 10, 2011, the Agency considers that our label amendment of October 6, 2008 is not considered as a submission.
- 3) We are now submitting the label amendment for the Tebuconazole Technical (EPA Reg. No. 69361-10) as a separate action item.
 - 4) As advised by your June 26, 2008 letter, we have revised the label in the **Directions for Use** under the **Terrestrial Non-Food** section to also delete the "and paint systems for in-film preservations including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodegradation."

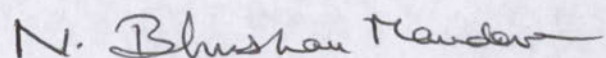
We have included with this submission please find the following:

1. Application for Pesticide Registration Notification (EPA Form 8570-1)
2. Certification with Respect to Citation of Data (EPA Form 8570-34)
3. Data Matrix (EPA Form 8570-35)
4. 5 copies of the amended label for Tebuconazole Technical (EPA Reg. 69361-10) label with the additional uses.

We request the Agency to please approve the amended label for Tebuconazole Technical at the earliest as the growing season is fast approaching and your assistance in this matter would be greatly appreciated.

Thank you for your comments and assistance on this subject matter.

Sincerely,



N. Bhushan Mandava, Ph.D.
Agent for Repar Corporation

Enclosures

Material Sent for Data Extraction

Reg. # 69361-10

Description: New alt #2 CSF

☒ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☒ New CSF(s) Dated 7-13-2011

☐ Other: _____

☐ Decision #: 450324

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: ROBERT WESTIN

Phone: 305-5721 Division: RD/FB

Date: Nov 1, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Repar Corporation
% N. Bushan Mandava
Mandava Associates, LLC
1730 M Street N.W., Suite 906
Washington, DC 20036-4510

OCT 31 2011

Product Name: Tebuconazole Technical
EPA Reg. No.: 69361-10
Subject: Your amendment dated July 13, 2011
OPP Decision Number: 450324

Dear Dr. Mandava:

The alternate Confidential Statement of Formula #2 (CSF) dated 7/13/2011 referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable and will be added to the files for this product.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mary L. Waller".

Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7504P)

Enclosure:

Product Chemistry Review DP391863 dated September 24, 2011
Acute Toxicity Similarity Review DP391864 dated September 30, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

30/SEP/2011

MEMORANDUM

Subject: Name of Pesticide Product: Tebuconazole Technical
EPA Reg. No. /File Symbol: 69361-10
DP Barcode: D391864
Decision No: 450324
Action Code: R340
PC Code: 128997 (tebuconazole)

From: Eugenia McAndrew, Biologist
Technical Review Branch
Registration Division (7505P)

E. McAndrew

W. G. Gaskin
Lead Toxicologist

To: Robert Westin, RM Team 21
Fungicide Branch
Registration Division (7505P)

Applicant: Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Tebuconazole	97.0

<u>Inert Ingredient(s):</u>	<u>3.0</u>
Total:	100.0%

ACTION REQUESTED: The Risk Manager requests: "Is the product described by the alternate #2 CSF dated 7/13/11 toxicologically similar to the product described by the basic CSF dated 5/10/06?"

BACKGROUND: Repar Corporation has submitted an application to amend the registration of Tebuconazole Technical, EPA Reg. No. 69361-10. The purpose of this amendment is to add an alternate CSF #2 dated July 13, 2011. The current accepted CSF on file is a basic dated May 10, 2006.

RECOMMENDATIONS:

1. TRB compared the proposed alternate #2 CSF and the current basic CSF and concluded that the two formulations are toxicologically similar. The proposed alternate formulation #2 is acceptable from a toxicological viewpoint.
2. The precautionary labeling will remain the same with the signal word WARNING.
3. The proposed alternate CSF #2 must be approved by the TRB Product Chemistry Team.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

FEE

BARCODE: 391863; **Reg. No.:** 69361-10; **PRODUCT NAME:** Tebuconazole Technical

DATE: September 24, 2011

SUBJECT: Product Chemistry Review of Tebuconazole Technical

FROM: Akiva Abramovitch, Ph.D.
Technical Review Branch / RD (7505P)

THROUGH: Shyam B. Mathur, Ph.D.
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

St
SBM 10/4/11

TO: Robert Westin, Reviewer / Mary Waller, Product Manager, RM 21
Fungicide Branch / RD (7505P)

DP BARCODE: 391863
DECISION No.: 450324
PC CODE: 128997
REGISTRANT: REPAR Corporation
USE: Fungicide
MRID Numbers: 485056-01 through 03

INTRODUCTION:

The registrant is seeking to add a new manufacturing site to a current product registration containing the active ingredient Tebuconazole. The product proposed CSF for Alternate Formulation #2 dated July 13, 2011 is for a product production site at location in [REDACTED]. The basic CSF dated 5/10/06 is also [REDACTED]. An alternate CSF #1 dated 10/10/08 was approved on 10/16/08 (DP355558).

The registrant submitted Group A data including a five batch analysis in MRID 485056-02 and also included Group B in MRID 485056-03. The three sites use an identical manufacturing process.

SUMMARY OF FINDINGS:

1. The product chemistry data submitted for Group A corresponding to guidelines 830.1550 (product identity and composition), 830.1600 (description of materials used to produce the product), 830.1650 (description of formulation process), 830.1670 (discussion of formation of impurities), 830.1750 (certified limits) satisfy the product chemistry data requirements for the proposed formulation [MRID 485056-01 and 02].
2. The product chemistry data Group A submitted corresponding to guideline reference 830.1700 (preliminary analysis) to support the claims on the CSF satisfy the data requirements. [MRID No. 485056-02].

Product Source Information May be Entitled to Confidential Treatment

PRODUCT CHEMISTRY DATA (SERIES 830 Group A)

Group A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (same as in proposed alternate CSF dated 10/10/2008)	A	485056-01
830.1600. Beginning Materials	A	485056-01
830.1620. Production process	A	485056-01
830.1650. Formulation process	N/A	485056-01
830.1670. Discussion of Impurities	A	485056-02
830.1700. Preliminary Analysis	A	485056-02
830.1750. Certified Limits (same as in alternate formulation dated 10/10/2008)	A	485056-02
830.1800. Enforcement Analytical Method	A	485056-02

CONCLUSIONS:

1. The proposed CSF #2 dated July 13, 2011 for the alternate formulation by [REDACTED] is acceptable. The content of active ingredient and impurities listed on the CSF are within the certified limits of the basic formulation and the label. There are no new impurities to those listed on the basic CSF and the alternate CSF #1
2. The 5 batch analysis results supports the CSF dated July 13, 2011 having identical impurities and all within the approved upper limits listed on the basic CSF. The percentage of the active ingredient ranged from 98.39 to 98.70% for the five batches and averaged 98.57% (97% label claim).
3. A group B physical and chemical properties summary was submitted but Group B data were previously reviewed for the original registration to satisfy the data requirements.

Product ingredient source information may be entitled to confidential treatment



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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Repar Corporation P.O. Box 4321 Silver Spring, MD 20914; (202) 223-1424	EPA Registration Number/File Symbol 69361-10
Active Ingredient(s) and/or representative test compound(s) Tebuconazole (CAS# 107534-96-3)	Date June 22, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Fungicide, Terrestrial, Food Crops	Product Name TEBUCONAZOLE TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>N. Bhushan Mandava</i>	Date June 22, 2011	Typed or Printed Name and Title N. Bhushan Mandava, Agent for Repar Corporation
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DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

Page 1 of 15

Applicant's/Registrant's Name & Address

Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product

TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition		Repar Corporation	OWN	
			P.O. Box 4321 Silver Spring, MD 20914		
830.1600	Description of Materials Used to Produce the Product		Repar Corporation	OWN	
830.1620	Description of Production Process		Repar Corporation		Not Required
830.1650	Description of Formulation Process		Repar Corporation	OWN	
830.1670	Discussion of Formation of Impurities		Repar Corporation	OWN	
830.1700	Preliminary Analysis		Repar Corporation	OWN	
830.1750	Certified Limits		Repar Corporation	OWN	
830.1800	Enforcement Analytical Method		Repar Corporation	OWN	
830.6302	Color		Repar Corporation	OWN	
830.6303	Physical State		Repar Corporation	OWN	
830.6304	Odor		Repar Corporation	OWN	
830.6313	Stability to Normal & Elevated Temperatures, Metals		Repar Corporation		Not Required
	and Metal Ions				
830.6314	Oxidation/Reduction: Chemical Incompatibility		Repar Corporation		Not Required

Signature

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



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DATA MATRIX

Date June 22, 2011			EPA Reg No./File Symbol 69361-10		Page 2 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability		Repar Corporation		Not Required
830.6316	Explosibility		Repar Corporation		Not Required
830.6317	Storage Stability		Repar Corporation	OWN	
830.6319	Miscibility		Repar Corporation	OWN	
830.6320	Corrosion Characteristics		Repar Corporation	OWN	
830.6321	Dielectric Breakdown Voltage		Repar Corporation		Not Required
830.7000	pH		Repar Corporation	OWN	
830.7050	UV/Visible Absorption		Repar Corporation		Not Required
830.7100	Viscosity		Repar Corporation	OWN	
830.7200	Melting Point/Melting Range		Repar Corporation		Not Required
830.7220	Boiling Point/Boiling Range		Repar Corporation		Not Required
830.7300	Density/Relative Density/Bulk Density		Repar Corporation	OWN	
830.7370	Dissociation Constants in Water		Repar Corporation		Not Required
830.7550	Partition Coefficient (n-octanol/water),		Repar Corporation		Not Required
	Shake Flask Method				
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011



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DATA MATRIX

Date June 22, 2011		EPA Reg No./File Symbol 69361-10		Page 3 of 15	
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method		Repar Corporation		Not Required
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography		Repar Corporation		See 830.7550
830.7840	Water Solubility: Column Elution Method; Shake Flask Method		Repar Corporation	OWN	
830.7860	Water Solubility, Generator Column Method		Repar Corporation		See 830.7840
830.7950	Vapor Pressure		Repar Corporation		Not Required
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011



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DATA MATRIX

Date June 22, 2011			EPA Reg No./File Symbol 69361-10		Page 4 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Bayer CropScience, LP P.O. Box 12014	Pay	
			2 T.W. Alexander Drive		
			Research Triangle Park, NC 27709 (CO.#264)		
			FMC CORP. Agricultural Products Group	Pay	
			1735 Market St., RM 1978		
			Philadelphia, PA 19103 (Company # 279)		
			Bayer Environmental Science P.O. Box 12014	Pay	
			2 T.W. Alexander Drive		
			Research Triangle Park, NC 27709 (CO.#432)		
			Cleary Chemicals, LLC	Pay	
			178 Ridge Road, Suite A		
			Dayton, NJ 08810 (Company # 1001)		
			Osmose, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 3008)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011



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Date June 22, 2011			EPA Reg No./File Symbol 69361-10		Page 5 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Bayer Corp. P.O. Box 4913	Pay	
			8400 Hawthorn Road		
			Kansas City, MO 64120 (Company #3125)		
			Cerexagri, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			KIng of Prussia, PA 19406 (Company # 4581)		
			Cheminova A/S	Pay	
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 4787)		
			Gustafson, LLC	Pay	
			P.O. Box 660065		
			Dallas, TX 75266 (Company # 7501)		
			J.J. Mauget Co.	Pay	
			12733 Director's Loop		
			Woodbridge, VA 22192 (Company # 7946)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011



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DATA MATRIX

Date June 22, 2011			EPA Reg No./File Symbol 69361-10		Page 6 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Chemical Specialities, Inc.	Pay	
			P.O. Box 1330		
			Harrisburg, NC 28075 (Company #10465)		
			CP Chemicals, Inc.	Pay	
			2395 Cains Mill Road		
			Sumter, SC 29154 (Company # 11435)		
			Makhteshim Chemical Works, LTD.	Pay	
			4515 Falls of Neuse Road, Suite 300		
			Raleigh, NC 27609 (Company # 11678)		
			Loveland Products, Inc.	Pay	
			P.O. Box 1286		
			Greeley, CO 80632 (Company # 34704)		
			Oxon Italia S.P.A.	Pay	
			2520 Meridian Pkwy., Suite 525		
			Durham, NC 27713 (Company # 35915)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011



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DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

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Applicant's/Registrant's Name & Address
Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product
TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Lanxess Corporation	Pay	
			111 RIDC Park West Drive		
			Pittsburgh, PA 15275 (Company #39967)		
			Luxembourg-Pamol, Inc.	Pay	
			3647 Willowbend Blvd., Suite 810		
			Houston, TX 77054 (Company # 42519)		
			Albaugh, Inc.	Pay	
			1525 NE 36th Street		
			Ankeny, IA 50021 (Company # 42750)		
			BASF Sparks, LLC	Pay	
			P.O. Box 13528		
			RTP, NC 27709 (Company # 51036)		
			NuFarm Americas, Inc.	Pay	
			150 Harvester Drive, Suite 200		
			Burr Ridge, IL 60527 (Company # 55146)		

Signature

N. B. Mandava

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



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DATA MATRIX

Date June 22, 2011			EPA Reg No./File Symbol 69361-10		Page 8 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			KOP-COAT, Inc.	Pay	
			436 Seventh Avenue		
			Pittsburgh, PA 15219 (Company #60061)		
			Sipcam Agro USA, Inc.	Pay	
			2520 Meridian Pkwy., Suite 525		
			Durham, NC 27713 (Company # 60063)		
			Arch Wood Protection, Inc.	Pay	
			5660 New Northside Drive, Suite 1100		
			Atlanta, GA 30328 (Company # 62190)		
			Makhteshim-Agan of North America, Inc.	Pay	
			4515 Falls of Neuse Rd., Suite 300		
			Raleigh, NC 27609 (Company # 66222)		
			Arysta Lifescience North America, LLC	Pay	
			15401 Weston Parkway, Suite 150		
			Cary, NC 27513 (Company # 66330)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

Page 9 of 15

Applicant's/Registrant's Name & Address

Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product

TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Spray Drift Task Force	Pay	
			1900 K Street, NW		
			Washington, DC 20006 (Company #66607)		
			Cheminova, Inc.	Pay	
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 67760)		
			United Phosphorus, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 70506)		
			Sulphur Mills, Ltd.	Pay	
			1629 Pollasky Avenue, Suite 111		
			Clovis, CA 93612 (Company # 70905)		
			Outdoor Residential Exposure Task Force	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company # 71754)		

Signature

N. B. Mandava

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
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DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

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Applicant's/Registrant's Name & Address

Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product

TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Agricultural Reentry Task Force	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company #71755)		
			Bayer Advanced P.O. Box 12014	Pay	
			2 T.W. Alexander Drive		
			RTP, NC 27709 (Company # 72155)		
			Nisso TM LLC	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 73545)		
			FIFRA Endangered Species Task Force, LLC	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company # 73989)		
			Irvita Plant Protection N.V.	Pay	
			4515 Falls of Neuse Rd., Suite 300		
			Raleigh, NC 27609 (Company # 74054)		

Signature

N. B. Mandava

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



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DATA MATRIX

Date June 22, 2011

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Applicant's/Registrant's Name & Address

Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product

TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Punjab Chemicals \$ Crop Protection, Ltd.	Pay	
			10039 East Troon North Drive		
			Scottsdale, AZ 85262 (Company #74280)		
			Osmose New Zealand	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 74405)		
			Arch Wood Protection (NZ) Limited	Pay	
			5660 New Northside Drive, Ste 1100		
			Atlanta, GA 30328 (Company # 75101)		
			Agricultural Handlers Exposure Task Force	Pay	
			P.O. Box 509/1720 Prospect Drive		
			Macon, MO 63552 (Company # 75234)		
			Osmose Utilities Services, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 75341)		

Signature

N. B. Mandava

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

Page 12 of 15

Applicant's/Registrant's Name & Address
Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product
TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Arch Treatment Technologies, Inc.	Pay	
			5660 New Northside Drive, Suite 1100		
			Atlanta, GA 30328 (Company #75506)		
			U.S. Triazole Task Force	Pay	
			600 13th Street, NW, 12th Floor		
			Washington, DC 20005 (Company # 75576)		
			Gro-Pro, LLC	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company # 79676)		
			Rotam Limited	Pay	
			4032 Crockers Lake Blvd., Suite 818		
			Sarasota, FL 43238 (Company # 81598)		
			Source Dynamics, LLC	Pay	
			10039 East Troon North Drive		
			Scottsdale, AZ 85262 (Company # 82542)		

Signature

N. B. Mandava

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

Page 13 of 15

Applicant's/Registrant's Name & Address
Repar Corporation P.O. Box 4321 Silver Spring, MD 20914Product
TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Sharda Worldwide Exports Pvt., Ltd.	Pay	
			7460 Lancaster Pike, Suite 9		
			Hockessin, DE 19707 (Company #82633)		
			Rotam Agrochemical Company Limited	Pay	
			4032 Crockers Lake Blvd., Suite 818		
			Sarasota, FL 43238 (Company # 83100)		
			J. Oliver Products, LLC	Pay	
			115 Obtuse Hill Road		
			Brookfield, CT 06804 (Company # 83222)		
			Sharda USA LLC	Pay	
			7460 Lancaster Pike, Suite 9		
			Hockessin, DE 19707 (Company # 83529)		
			Amtide, LLC	Pay	
			21 Hubble		
			Irvine, CA 92618 (Company # 83851)		

Signature

N. B. Mandava

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date

June 22, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date June 22, 2011			EPA Reg No./File Symbol 69361-10		Page 14 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Generic Endangered Species Task Force	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company #84653)		
			Phibro Wood, LLC	Pay	
			65 Challenger Road, Third Floor		
			Ridgefield Park, NJ 07660 (Company # 84661)		
			Trustchem Co., Ltd.	Pay	
			89 Hanzhang Road, D2, 23rd Floor		
			Nanjing 210019 (Company # 86296)		
			Berkem Developpement	Pay	
			149 East 36th Street		
			New York, NY 10016 (Company # 86505)		
			Willowood Propiconazole, LLC	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company #87284)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 22, 2011

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date June 22, 2011

EPA Reg No./File Symbol 69361-10

Page 15 of 15

Applicant's/Registrant's Name & Address

Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product

TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

[illegible]

Signature _____

N. B. Handave

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date _____

June 22, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 1, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-450324
EPA File Symbol or Registration Number: 69361-10
Product Name: TEBUCONAZOLE TECHNICAL
EPA Application Receipt Date: 10-Jun-2011
EPA Waiver Request Receipt Date: 10-Jun-2011
EPA Company Number: 69361
Company Name: REPAR CORP

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES, LLC
REPAR CORP
1050 CONN. AVE., N.W., SUITE 1000
WASHINGTON, DC 20036

SUBJECT: Approval of Waiver Request

Dear Registrant:

The Office of Pesticide Programs has approved your request for 75% waiver of the pesticide registration fee associated with the action referenced above. The decision review period for this action will begin on the date of this letter.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman, at (703) 308-9362.

Sincerely,

A handwritten signature in cursive script, appearing to read "Oscar Morales".

Oscar Morales, Director
Information Technology & Resources Management Division
Office of Pesticide Programs

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 CONNECTICUT AVENUE, N.W., SUITE 1000, WASHINGTON, DC 20036
Telephone: (202)-223-1424/1747 • Fax: (202)-223-0141 • E-MAIL: Mandava@compuserve.com

DESTINATION NO. 703-305-6920
ATTENTION OF Bob Weston
COMPANY EPA-OPP-RD
NUMBER OF PAGES 2 (INCLUDING COVER)
AUTHORIZED BY Blumen Hander
DATE 07-13-11

COMMENTS

Bob
Thanks
Blumen

5899520

change CSF from basic to alt # 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 15, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES, LLC
REPAR CORP
1050 CONN. AVE., N.W., SUITE 1000
WASHINGTON, DC 20036

69361-10
D-450324

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 10-JUN-11. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 13, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-450324
EPA File Symbol or Registration Number: 69361-10
Product Name: TEBUCONAZOLE TECHNICAL
EPA Receipt Date: 10-Jun-2011
EPA Company Number: 69361
Company Name: REPAR CORP

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES, LLC
REPAR CORP
1050 CONN. AVE., N.W., SUITE 1000
WASHINGTON, DC 20036

SUBJECT: Receipt of Amendment and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your amendment application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340
NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to read "mull" followed by a stylized flourish.

Front End Processing Staff

Information Technology & Resources Management Division

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 CONNECTICUT AVENUE, N.W., SUITE 1000, WASHINGTON, DC 20036
TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com

Hand Delivered

June 10, 2011

Ms. Mary Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Registration Fee Waiver
Request 75% Fee Waiver as Small Business
Product Name: Tebuconazole Technical
EPA Reg. No. 69361- 10
Company Name: Repar Corporation
Company Number: 69361

Dear Ms. Waller:

We are submitting an Application for Registration (EPA Form 8570-1) for the subject product. On this form, we have indicated that we are submitting 75% fee waiver request as small business.

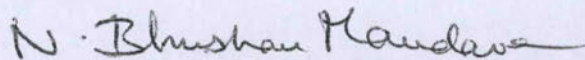
On December 3, 2010, the Agency granted our request for approval of 75% waiver of the pesticide registration fee for Repar Corporation as Small Business. The OPP Decision Number is D-442106.

We identified the Action Code for Tebuconazole Technical as **R340**.

We have paid the fee online of \$904.25 (Pay.gov Tracking ID: 253J4KQ1; Agency Tracking ID: 74208924483; Transaction date and Time: 06/10/2011, 10:29 EDT).

We now request the Agency to approve granting the 75% fee waiver for the subject product as small business.

Sincerely,



N. Bhushan Mandava, Ph.D., RAC
Agent for Repar Corporation

Enclosure

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Repar Corporation
c/o Mandava Associates, LLC
1050 Connecticut Avenue, NW/ Suite 1000
Washington, DC 20036

REGULATORY ACTION SUPPORTED BY THIS PACKAGE:

FIFRA Registration Application for:

Product Name:	TEBUCONAZOLE TECHNICAL
Active Ingredient:	Tebuconazole
Active Ingredient No.:	128997

Company Name:	Repar Corporation
Company Number:	69361
EPA Reg. No.:	69361- 10

TRANSMITTAL DATE:

June 8, 2011

LIST OF SUBMITTED STUDIES:

- 48505601** 1) Volume 1: **TEBUCONAZOLE TECHNICAL: Group A – Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900** (Project No.: REPAR-TEBU TECH-PC-14); Repar Corporation.
- 48505602** 2) Volume 2: **TEBUCONAZOLE TECHNICAL: Group A- Product Identity, Composition, and Analysis. Product Properties in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700 – 1900** (Project No.: REPAR-TEBU TECH-PC-15); Repar Corporation

Fee for Service

W
{897598t~

This package includes the following

☐ New Registration

☒ Amendment

☒ Studies? ☒ Fee Waiver?

☐ volpay % Reduction: 75

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

21

Receipt No.

S- **897598**

EPA File Symbol/Reg. No.

69361-10

Pin-Punch Date:

6/10/2011

☐ This item is NOT subject to FFS action.

Action Code:

Requested: **R340**

Granted: **R340**

Amount Due: \$ 3617

NO Inerts for review. J.S./06-15-11

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: S. Hill

Date: 6/13/11

Remarks:

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 6-10-11 3/23/09
 Experts In-Processing Signature: B. [Signature] Date 6-13-11 Fee Paid: Yes ☒
 Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>69361-10</u>		EPA Receipt Date: <u>6-10-11</u>								
Items for Review				Yes	No	N/A*				
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			<input checked="" type="checkbox"/>						
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			<input checked="" type="checkbox"/>						
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) <table border="1" style="float: right; margin-left: 10px;"> <tr> <th style="width: 50px;">yes</th> <th style="width: 50px;">no</th> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td></td> </tr> </table>			yes	no	<input checked="" type="checkbox"/>				
yes	no									
<input checked="" type="checkbox"/>										
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>						
	Certificate and data matrix consistent			<input checked="" type="checkbox"/>						
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B) <table border="1" style="float: right; margin-left: 10px;"> <tr> <th style="width: 50px;">yes</th> <th style="width: 50px;">no</th> </tr> <tr> <td></td> <td></td> </tr> </table>			yes	no					
yes	no									
	If applicable, is there a letter of Authorization for exclusive use only.									
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					<input checked="" type="checkbox"/>				
5	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>						
	a) Selective Method (Fee category experts use) <table border="1" style="float: right; margin-left: 10px;"> <tr> <th style="width: 50px;">yes</th> <th style="width: 50px;">no</th> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td></td> </tr> </table>			yes	no	<input checked="" type="checkbox"/>				
	yes	no								
	<input checked="" type="checkbox"/>									
b) Cite-All (Fee category experts use)										
c) Applicant owns all data (Fee category experts use)										
6	5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			<input checked="" type="checkbox"/>						

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

* Studies passed 86-5 review.

* Regarding the CSF amendment, the wrong method of support was selected in the certification with respect to citation of data form. Registrant was contacted on 06/13/11. Registrant sent the corrections on 06/13/11 later in the evening.

* No inerts to review, technical and water only.

* 86-5 review - Passed

* Amendment - Passed

S.S/06-15-11

MRID-485056

* N/A - Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/oppr001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/opbpbpd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/oppr001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Script for Rejection Phone calls

Contact Name: Bhushan Mandava
Phone #: 202-223-1424
Email: mandava@compuserve.com

First Call/Initials:

Date: 06-13-11

Time: 4:15 pm

Second Call/Initials:

Date:

Time:

This is Srijana Shrestha, EPA contractor.

I'm calling regarding your submission in support of the product, "Tebuconazole Technical," Reg-# 69361-10.

We have found the following deficiencies regarding:

PR Notice 86.5: Yes or No

Volume/Study Title:

Volume/Study Title:

Volume/Study Title:

Additional volumes continued on back of page: Yes or No

Application Package: Yes or No

Wrong method of support was selected for certification form. (Details in the email attached)

These deficiencies have been approved by EPA.

The corrections can be faxed to 703-305-5060/Attn: Srijana Shrestha

Second Call/Email:

If we do not receive the corrections by _____, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.

passed!

RE: Regarding Submission in Support of the Product, "Tebuconazole Technical", EPA Reg # 69361-10
Bhushan Mandava
to:
Srijana Shrestha
06/13/2011 05:02 PM
Cc:
"Bhushan Mandava"
Hide Details
From: "Bhushan Mandava"

To: Srijana Shrestha/DC/USEPA/US@EPA

Cc: "Bhushan Mandava"

Dear Ms. Shrestha:

Please find enclosed the updated Certification with Respect to Citation of Data as per our telephone conversation and your email.

Thank you for your assistance.

Regards,

N. Bhushan Mandava
Mandava Associates, LLC
1050 Connecticut Avenue, N.W.
Suite 1000
Washington, D.C. 20036
(202) 223 - 1424
(202) 223 - 0141

Notice: This E-mail (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received the message in error and then delete it. Thank you.

-----Original Message-----

From: Shrestha.Srijana@epamail.epa.gov [mailto:Shrestha.Srijana@epamail.epa.gov]
Sent: Monday, June 13, 2011 4:49 PM
To: Bhushan Mandava
Cc: Nair.Sree@epamail.epa.gov
Subject: Regarding Submission in Support of the Product, "Tebuconazole Technical",
EPA Reg # 69361-10

Dear Mr. Mandava:

As per our phone conversation, this is regarding your submission in support of the Product "Tebuconazole Technical", EPA Reg # 69361-10. We have found the following issue regarding your application:

In the Certification with Respect to Citation of Data Form, in SECTION I: METHOD OF DATA SUPPORT, you have checked "the cite-all-method". However, the Selective Method of support should be checked since you own most of the data.

Please send the revised form either by email or fax to 703-305-5060, Attn: Srijana Shrestha. Feel free to call me back at 703-305-6471 if you have any questions.

Thanking you,
Srijana Shrestha
Macfadden, EPA Contractor
2777 S. Crystal Drive, S 4910 A
Arlington, VA 22202
Ph: 703-305-6471
Fax: 703-305-5060



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 69361-10	2. EPA Product Manager Mary Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Repar Tebuconazole Technical	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Repar Corporation P.O. Box 4321 Silver Spring, MD 20914 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

- 1) This application is for the approval of alternate source of Repar Tebuconazole Technical (EPA Reg. No. 69361-10) and includes fee waiver request.
2) Submittal of Product Chemistry data on Tebuconazole Technical from [REDACTED] which is proposed to be used as the alternate source.
3) The action code for this request is R34. 4) Please direct all correspondence to: Mandava Associates, LLC; 1050 Connecticut Avenue, NW / Suite 1000; Washington, D.C. 20036. 5) The contact person fax number is (202) 223 - 0141 and e-mail address is: mandava@compuserve.com.

Product ingredient source information may be entitled to confidential treatment

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 20 kg, 50 Kg		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name N. Bhushan Mandava		Title Agent for Repar Corporation		Telephone No. (Include Area Code) 202-223-1424	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature N. Bhushan Mandava		3. Title Agent for Repar Corporation			
4. Typed Name N. Bhushan Mandava		5. Date June 8, 2011			

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 CONNECTICUT AVENUE, N.W., SUITE 1000, WASHINGTON, DC 20036

TELEPHONE: (202)-223-1424/1747 • TELEFAX: (202)-223-0141 • E-Mail: mandava@compuserve.com

Hand Delivered

June 10, 2011

Ms. Mary Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Registration Fee Waiver
Request 75 % Fee Waiver as Small Business
Product Name: Tebuconazole Technical
EPA Reg. No. 69361- 10
Company Name: Repar Corporation
Company Number: 69361

Dear Ms. Waller:

We are submitting an Application for Registration (EPA Form 8570-1) for the subject product. On this form, we have indicated that we are submitting 75% fee waiver request as small business.

On December 3, 2010, the Agency granted our request for approval of 75% waiver of the pesticide registration fee for Repar Corporation as Small Business. The OPP Decision Number is D-442106.

We identified the Action Code for Tebuconazole Technical as **R340**. We have paid the fee online of \$904.25 (Pay.gov Tracking ID: 253J4KQ1; Agency Tracking ID: 74208924483; Transaction date and Time: 06/10/2011; 10:29 EDT).

We now request the Agency to approve granting the 75% fee waiver for the subject product as small business.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., RAC
Agent for Repar Corporation

Enclosure

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

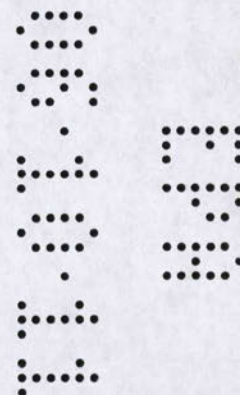
Pay.gov Tracking ID: 253J4KQ1

Agency Tracking ID: 74208924483

Transaction Date and Time: 06/10/2011 10:29 EDT

Payment Summary

Address Information	Account Information	Payment Information
Account Holder Name: Naga Bhushan Mandava 15404 Tindlay Billing Address: Street Billing Address 2: City: Silver Spring State / Province: MD Zip / Postal Code: 20905 Country: USA	American Card Type: Express Card Number: *****4009 Decision Number: Registration Number: 69361-10 Repar Company Name: Corporation Company Number: 69361 Action Code: R340	Payment Amount: \$904.25 Transaction Date 06/10/2011 and Time: 10:29 EDT



MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1050 Connecticut Avenue, N.W., SUITE 1000, WASHINGTON, DC 20036-4549

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-MAIL: mandava@compuserve.com

June 8, 2011

HAND DELIVERED

Project ID: Repar Corporation – Submission of Alternate Source for Repar Tebuconazole Technical

To: Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

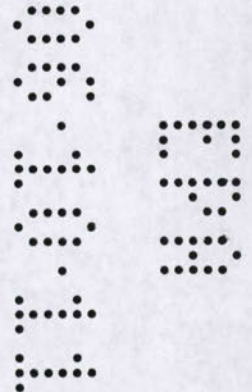
Today, I received an unopened package containing the data volumes and administrative material for Repar Tebuconazole Technical and addressed to:

Ms. Mary L. Waller (PM 21)
Fungicide Branch
Registration Division (P7505)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

Signature: _____

Printed Name: _____

Date: _____



***NOTE TO COURIER:**

AFTER DELIVERING THE PACKAGE, PLEASE HAVE THE RECIPIENT SIGN THIS DELIVERY RECEIPT AND PLACE IN ENCLOSED STAMPED, SELF ADDRESSED ENVELOPE AND DROP IN THE NEAREST MAIL BOX. THANK YOU.

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 Connecticut Avenue, N.W., Suite 1000, WASHINGTON, DC 20036-4510
Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: Mandava@compuserve.com

June 8, 2011

Ms. Mary L. Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT: Alternate Source for TEBUCONAZOLE TECHNICAL
Active Ingredient: Tebuconazole
EPA Reg. No.: 69361 – 10

Registrant: Repar Corporation

Dear Ms. Waller:

Tebuconazole Technical (EPA Reg. No.: 69361-10) is registered by Repar Corporation (“Repar”). According to label ingredient statement, the purity of active ingredient is 97% in Tebuconazole Technical.

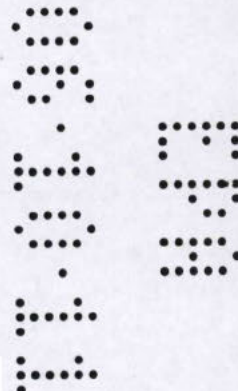
The registrant (Repar) is seeking an alternative source for tebuconazole technical and the producer for proposed alternate source is [REDACTED]

On behalf of Repar Corporation, we are submitting the Product Chemistry data in support of a **ME-TOO** application for the registration of TEBUCONAZOLE TECHNICAL.

In support of the alternate source for Tebuconazole Technical, we are providing the following administrative materials.

- 1) Application for Pesticide Registration (EPA Form 8570-1)
- 2) Registration Fee Waiver Payment
- 3) Confidential Statement of Formula
- 4) Certification with Respect to Citation of Data (EPA Form 8570-34)
- 5) Data Matrix (EPA Form 8570 – 35)

Product ingredient source information may be entitled to confidential treatment



We are also submitting the product chemistry data in support of the alternate source for Tebuconazole Technical:

- 1) Volume 1: TEBUCONAZOLE TECHNICAL: Group A – Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-14); Repair Corporation.
- 2) Volume 2: TEBUCONAZOLE TECHNICAL: Group A- Product Identity, Composition, and Analysis. Product Properties in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700 – 1900 (Project No.: REPAR-TEBU TECH-PC-15); Repair Corporation
- 3) Volume 3: TEBUCONAZOLE TECHNICAL: Group B – Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302 – 7950 (Project No.: Repair-TEBU TECH-PC-16); Repair Corporation

We have enclosed a copy of the approved label for Tebuconazole Technical (EPA Reg. No. 69361-10) and the Confidential Statement of Formula (EPA Form 8570-4) for proposed alternate source product.

Since we unequivocally showed that, based on the product chemistry data, the proposed alternate source for Tebuconazole Technical is the same as or substantially similar to the registered Tebuconazole Technical (EPA Reg. No.: 69361-10), we request you to approve the proposed alternate source (alternate formulation).

Thank you for your ready cooperation.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., CPC, RAC
Agent for Repair Corporation

Enclosures

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Repar Corporation
c/o Mandava Associates, LLC
1050 Connecticut Avenue, NW/ Suite 1000
Washington, DC 20036

REGULATORY ACTION SUPPORTED BY THIS PACKAGE:

FIFRA Registration Application for:

Product Name:	TEBUCONAZOLE TECHNICAL
Active Ingredient:	Tebuconazole
Active Ingredient No.:	128997

Company Name:	Repar Corporation
Company Number:	69361
EPA Reg. No.:	69361- 10

TRANSMITTAL DATE:

June 8, 2011

LIST OF SUBMITTED STUDIES:

- 1) Volume 1: TEBUCONAZOLE TECHNICAL: Group A – Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-14); ¹⁵⁰⁰Repar Corporation.
- 2) Volume 2: TEBUCONAZOLE TECHNICAL: Group A- Product Identity, Composition, and Analysis. Product Properties in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700 – 1900 (Project No.: REPAR-TEBU TECH-PC-15); Repar Corporation

- 3) Volume 3: **TEBUCONAZOLE TECHNICAL: Group B – Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302 – 7950 (Project No.: Repar-TEBU TECH-PC-16); Repar Corporation**

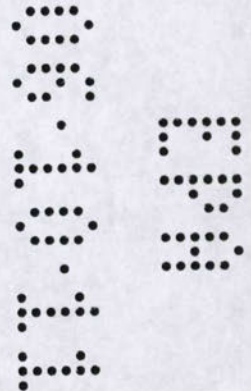
COMPANY OFFICIAL:

N. Bhushan Mandava

N. Bhushan Mandava
Registration Agent for Repar Corporation

COMPANY CONTACT:

N. Bhushan Mandava
Mandava Associates, LLC
1050 Connecticut Avenue, NW/Suite 1000
Washington, D.C. 20036
Tel: (202) 223-1424/1747
Fax: (202) 223 - 0141
Email: mandava@compuserve.com





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Repar Corporation P.O. Box 4321 Silver Spring, MD 20914; (202) 223-1424	EPA Registration Number/File Symbol 69361-10
Active Ingredient(s) and/or representative test compound(s) Tebuconazole (CAS# 107534-96-3)	Date June 13, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Fungicide, Insecticide, Terrestrial, Food Crops	Product Name Repar Tebuconazole Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

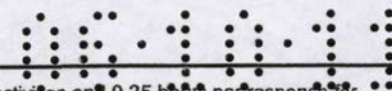
Signature <i>N. Bhushan Mandava</i>	Date June 13, 2011	Typed or Printed Name and Title N. Bhushan Mandava, Agent for Repar Corporation
--	-----------------------	--



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460



Form Approved OMB No. 2070-0060



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DATA MATRIX

Date June 7, 2011		EPA Reg No./File Symbol 69361-10		Page 1 of 15	
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition		Repar Corporation	OWN	
			P.O. Box 4321 Silver Spring, MD 20914		
830.1600	Description of Materials Used to Produce the Product		Repar Corporation	OWN	
830.1620	Description of Production Process		Repar Corporation		Not Required
830.1650	Description of Formulation Process		Repar Corporation	OWN	
830.1670	Discussion of Formation of Impurities		Repar Corporation	OWN	
830.1700	Preliminary Analysis		Repar Corporation	OWN	
830.1750	Certified Limits		Repar Corporation	OWN	
830.1800	Enforcement Analytical Method		Repar Corporation	OWN	
830.6302	Color		Repar Corporation	OWN	
830.6303	Physical State		Repar Corporation	OWN	
830.6304	Odor		Repar Corporation	OWN	
830.6313	Stability to Normal & Elevated Temperatures, Metals and Metal Ions		Repar Corporation		Not Required
830.6314	Oxidation/Reduction: Chemical Incompatibility		Repar Corporation		Not Required
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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DATA MATRIX

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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability		Repar Corporation		Not Required
830.6316	Explosibility		Repar Corporation		Not Required
830.6317	Storage Stability		Repar Corporation	OWN	
830.6319	Miscibility		Repar Corporation	OWN	
830.6320	Corrosion Characteristics		Repar Corporation	OWN	
830.6321	Dielectric Breakdown Voltage		Repar Corporation		Not Required
830.7000	pH		Repar Corporation	OWN	
830.7050	UV/Visible Absorption		Repar Corporation		Not Required
830.7100	Viscosity		Repar Corporation	OWN	
830.7200	Melting Point/Melting Range		Repar Corporation		Not Required
830.7220	Boiling Point/Boiling Range		Repar Corporation		Not Required
830.7300	Density/Relative Density/Bulk Density		Repar Corporation	OWN	
830.7370	Dissociation Constants in Water		Repar Corporation		Not Required
830.7550	Partition Coefficient (n-octanol/water),		Repar Corporation		Not Required
	Shake Flask Method				
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method		Repar Corporation		Not Required
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography		Repar Corporation		See 830.7550
830.7840	Water Solubility: Column Elution Method; Shake Flask Method		Repar Corporation	OWN	
830.7860	Water Solubility, Generator Column Method		Repar Corporation		See 830.7840
830.7950	Vapor Pressure		Repar Corporation		Not Required
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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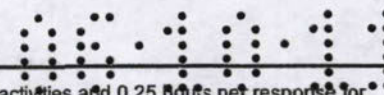
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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Bayer CropScience, LP P.O. Box 12014	Pay	
			2 T.W. Alexander Drive		
			Research Triangle Park, NC 27709 (CO.#264)		
			FMC CORP. Agricultural Products Group	Pay	
			1735 Market St., RM 1978		
			Philadelphia, PA 19103 (Company # 279)		
			Bayer Environmental Science P.O. Box 12014	Pay	
			2 T.W. Alexander Drive		
			Research Triangle Park, NC 27709 (CO.#432)		
			Cleary Chemicals, LLC	Pay	
			178 Ridge Road, Suite A		
			Dayton, NJ 08810 (Company # 1001)		
			Osmose, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 3008)		
Signature N. B. Mandava			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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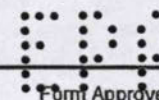
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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Bayer Corp. P.O. Box 4913	Pay	
			8400 Hawthorn Road		
			Kansas City, MO 64120 (Company #3125)		
			Cerexagri, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 4581)		
			Cheminova A/S	Pay	
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 4787)		
			Gustafson, LLC	Pay	
			P.O. Box 660065		
			Dallas, TX 75266 (Company # 7501)		
			J.J. Mauget Co.	Pay	
			12733 Director's Loop		
			Woodbridge, VA 22192 (Company # 7946)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Chemical Specialties, Inc.	Pay	
			P.O. Box 1330		
			Harrisburg, NC 28075 (Company #10465)		
			CP Chemicals, Inc.	Pay	
			2395 Cains Mill Road		
			Sumter, SC 29154 (Company # 11435)		
			Makhteshim Chemical Works, LTD.	Pay	
			4515 Falls of Neuse Road, Suite 300		
			Raleigh, NC 27609 (Company # 11678)		
			Loveland Products, Inc.	Pay	
			P.O. Box 1286		
			Greeley, CO 80632 (Company # 34704)		
			Oxon Italia S.P.A.	Pay	
			2520 Meridian Pkwy., Suite 525		
			Durham, NC 27713 (Company # 35915)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Lanxess Corporation	Pay	
			111 RIDC Park West Drive		
			Pittsburgh, PA 15275 (Company #39967)		
			Luxembourg-Pamol, Inc.	Pay	
			3647 Willowbend Blvd., Suite 810		
			Houston, TX 77054 (Company # 42519)		
			Albaugh, Inc.	Pay	
			1525 NE 36th Street		
			Ankeny, IA 50021 (Company # 42750)		
			BASF Sparks, LLC	Pay	
			P.O. Box 13528		
			RTP, NC 27709 (Company # 51036)		
			NuFarm Americas, Inc.	Pay	
			150 Harvester Drive, Suite 200		
			Burr Ridge, IL 60527 (Company # 55146)		
Signature N. B. Mandava			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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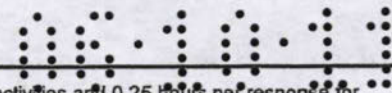
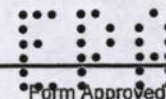
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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			KOP-COAT, Inc.	Pay	
			436 Seventh Avenue		
			Pittsburgh, PA 15219 (Company #60061)		
			Sipcam Agro USA, Inc.	Pay	
			2520 Meridian Pkwy., Suite 525		
			Durham, NC 27713 (Company # 60063)		
			Arch Wood Protection, Inc.	Pay	
			5660 New Northside Drive, Suite 1100		
			Atlanta, GA 30328 (Company # 62190)		
			Makhteshim-Agan of North America, Inc.	Pay	
			4515 Falls of Neuse Rd., Suite 300		
			Raleigh, NC 27609 (Company # 66222)		
			Arysta Lifescience North America, LLC	Pay	
			15401 Weston Parkway, Suite 150		
			Cary, NC 27513 (Company # 66330)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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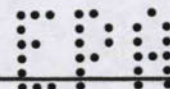
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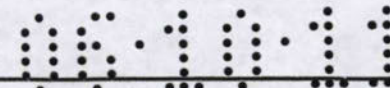
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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Spray Drift Task Force	Pay	
			1900 K Street, NW		
			Washington, DC 20006 (Company #66607)		
			Chemnova, Inc.	Pay	
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 67760)		
			United Phosphorus, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 70506)		
			Sulphur Mills, Ltd.	Pay	
			1629 Pollasky Avenue, Suite 111		
			Clovis, CA 93612 (Company # 70905)		
			Outdoor Residential Exposure Task Force	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company # 71754)		
Signature N. B. Mandava			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Agricultural Reentry Task Force	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company #71755)		
			Bayer Advanced P.O. Box 12014	Pay	
			2 T.W. Alexander Drive		
			RTP, NC 27709 (Company # 72155)		
			Nisso TM LLC	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 73545)		
			FIFRA Endangered Species Task Force, LLC	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company # 73989)		
			Irvita Plant Protection N.V.	Pay	
			4515 Falls of Neuse Rd., Suite 300		
			Raleigh, NC 27609 (Company # 74054)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Punjab Chemicals \$ Crop Protection, Ltd.	Pay	
			10039 East Troon North Drive		
			Scottsdale, AZ 85262 (Company #74280)		
			Osmose New Zealand	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 74405)		
			Arch Wood Protection (NZ) Limited	Pay	
			5660 New Northside Drive, Ste 1100		
			Atlanta, GA 30328 (Company # 75101)		
			Agricultural Handlers Exposure Task Force	Pay	
			P.O. Box 509/1720 Prospect Drive		
			Macon, MO 63552 (Company # 75234)		
			Osmose Utilities Services, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 75341)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Arch Treatment Technologies, Inc.	Pay	
			5660 New Northside Drive, Suite 1100		
			Atlanta, GA 30328 (Company #75506)		
			U.S. Triazole Task Force	Pay	
			600 13th Street, NW, 12th Floor		
			Washington, DC 20005 (Company # 75576)		
			Gro-Pro, LLC	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company # 79676)		
			Rotam Limited	Pay	
			4032 Crockers Lake Blvd., Suite 818		
			Sarasota, FL 43238 (Company # 81598)		
			Source Dynamics, LLC	Pay	
			10039 East Troon North Drive		
			Scottsdale, AZ 85262 (Company # 82542)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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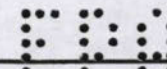
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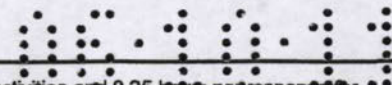
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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Sharda Worldwide Exports Pvt., Ltd.	Pay	
			7460 Lancaster Pike, Suite 9		
			Hockessin, DE 19707 (Company #82633)		
			Rotam Agrochemical Company Limited	Pay	
			4032 Crockers Lake Blvd., Suite 818		
			Sarasota, FL 43238 (Company # 83100)		
			J. Oliver Products, LLC	Pay	
			115 Obtuse Hill Road		
			Brookfield, CT 06804 (Company # 83222)		
			Sharda USA LLC	Pay	
			7460 Lancaster Pike, Suite 9		
			Hockessin, DE 19707 (Company # 83529)		
			Amtide, LLC	Pay	
			21 Hubble		
			Irvine, CA 92618 (Company # 83851)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Generic Endangered Species Task Force	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company #84653)		
			Phibro Wood, LLC	Pay	
			65 Challenger Road, Third Floor		
			Ridgefield Park, NJ 07660 (Company # 84661)		
			Trustchem Co., Ltd.	Pay	
			89 Hanzhang Road, D2, 23rd Floor		
			Nanjing 210019 (Company # 86296)		
			Berkem Developpement	Pay	
			149 East 36th Street		
			New York, NY 10016 (Company # 86505)		
			Willowood Propiconazole, LLC	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company #87284)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date June 7, 2011



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401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date June 7, 2011

EPA Reg No./File Symbol 69361-10

Page 15 of 15

Applicant's/Registrant's Name & Address

Repar Corporation P.O. Box 4321 Silver Spring, MD 20914

Product

TEBUCONAZOLE TECHNICAL

Ingredient Tebuconazole (CAS# 107534-96-3)

[illegible]

Signature

N. B. Mandar

Name and Title

N. Bhushan Mandava, Ph.D., Agent for Repar Corporation

Date _____

June 7, 2011

~~Material Sent for Data Extraction~~

Reg. # 69361-10

Description: Revised CSF - Notification

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: 391926

☐ Other Action/Comments: _____
Not accepted

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: ROBERT WESTIN

Phone: 305-5721 Division: RD/FB

Date: 4-17-2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

N. Bhushan Mandava, Ph.D.
Agent for Repar Corporation
C/o Mandava Associates, LLC
1730 M Street, N.W., Suite 906
Washington, DC 20036-4510

APR 17 2009

SUBJECT: Application for Pesticide Notification – Use of a Different Production Facility and
Revised Basic Confidential Statement of Formula (CSF)
Repar Tebuconazole Technical EPA Reg. No. 69361-10
Application and Basic CSF Dated April 2, 2008

Dear Dr. Mandava:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested do not clearly fall within the scope of PRN 98-10 and will require additional administrative review of the related files. A summary of our findings include:

1. You must provide the following PRN 98-10 certification statement for notification applications: "This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."
2. Because this is a "technical" product using a new "unregistered production facility", you must submit data to the Agency to determine if it is substantially similar to the product produced at the previously unregistered production facility. For more information about the type of data required, please contact Dr. Shyam Mathur, Product Chemistry Team Leader in the Technical Review Branch of RD.
3. This data must be submitted as an amendment to Mary Waller, Product Manager (PM) 21 in the Fungicide Branch of RD.

Please be advised that PR Notices are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination and concludes that this action is denied and you must submit it as an amendment to Mary Waller, Product Manager (PM) 21 in the Fungicide Branch of RD. No further processing of this action will occur until the amendment has been submitted to the Agency for review. Our records have been updated accordingly.

If you have any questions, please me directly at 703-305-6249, Terri Stowe of my staff at 703-305-6117, Shyam Mathur at 703-308-9374, or Mary Waller at 703-308-9354.

Sincerely,



Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 69361-10	2. EPA Product Manager Mary Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Repar Tebuconazole Technical	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Repar Corporation P.O. Box 4321 Silver Spring, MD 20914 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

- 1) We are notifying the EPA for a different production facility [REDACTED] for Repar Tebuconazole Technical (EPA Reg. No. 69361-10).
- 2) We are providing a corresponding Confidential Statement of Formula (CSF) with this notification.
- 3) Please direct all correspondence to: Mandava Associates, LLC; 1730 M Street, NW / Suite 906; Washington, D.C. 20036
- 4) The contact Person fax number is (202) 223 - 0141 and e-mail address is: mandava@compuserve.com.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 20 kg, 50 Kg		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name N. Bhushan Mandava	Title Agent for Repar Corporation	Telephone No. (Include Area Code) 202-223-1424	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		Date Application Received (Stamped)	
2. Signature N. Bhushan Mandava	3. Title Agent for Repar Corporation		
4. Typed Name N. Bhushan Mandava	5. Date April 2, 2008		

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4510
Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: Mandava@compuserve.com

April 2, 2008

Mary L. Waller
Product Manager 21
Fungicide Branch
Registration Division
Office of Pesticide Programs
Washington, DC 20460

SUBJECT: Producer for Tebuconazole Technical
EPA File Symbol: 69361-10

Dear Ms. Waller:

Repar Corporation intends to use another manufacturing site for the production of Tebuconazole Technical (EPA Reg. No.: 69361-10). The name of the toll manufacturer for this site is [REDACTED] Please be advised that it is the basic formulation because there is no change in the production process.

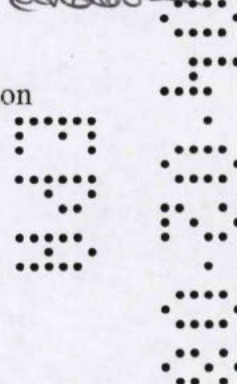
We have enclosed the Confidential Statement of Formula for your review. We are submitting this action as a notification.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava
Agent for Repar Corporation

Enclosure



Material to be added to an e-Jacket/Jacket

Reg. No. 69361-10

Description: New CSF D398151

1. ☒ Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☐ Notification

☒ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Robert Westin

Phone: 703-305-5721 Division: RD/FB

Date: Nov 13, 2008



5838607

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOV 12 2008

Repar Corporation
% N. Bushan Mandava
Mandava Associates, LLC
1730 M Street N.W., Suite 906
Washington, DC 20036-4510

Subject: Tebuconazole Technical
EPA Reg. No. 69361-10
Your amendment dated July 22, 2008
EPA Decision Number 398151

Dear Mr. Mandava:

The alternate Confidential Statement of Formula (CSF) dated 10/10/08 referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable.

A copy of the Product Chemistry Review DP355558 dated October 9, 2008 is enclosed for your records.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,

A handwritten signature in cursive script, reading "Mary L. Waller", is positioned above the typed name.

Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)

FEE

DATE OUT: 09 / OCTOBER / 2008

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF MP [X] EP []**
DP BARCODE No.: 355558 EPA Reg. No.: 69361-10
PRODUCT NAME: Repar Tebuconazole Technical
COMPANY: Repar Corporation
FOOD USE [X] INTEGRATED FORMULATION [X]
PCC: 128997 Decision No. 398151
ACTION CODE: R340

FROM: Hari Mukhoty DVM, PHD
Product Chemistry Team
Technical Review Branch / RD (7505P)

[Handwritten signature] *[Handwritten signature]* 10/16/08

TO: Robert Westin / Mary Waller, RM 21
Fungicide Branch / RD (7505P)

INTRODUCTION:

The Registrant has submitted one amended CSF (dated 10/10/2008) as an alternate formulation (Alternate # 1) to the basic product EPA Reg. No. 69361-10 for registration of the proposed alternate formulation. The product chemistry data have been submitted under MRIDs: 474917-01, -02, -03, and -04.

The basic product was registered on 12/21/2006 and the label was found to be acceptable on 06/26/2008. The product chemistry data for the basic product were reviewed and were found acceptable on 11/15/2006.

The registered MUP is manufactured by [REDACTED] whereas the alternate formulation is manufactured by [REDACTED] located at [REDACTED]

[REDACTED] The proposed product can be formulated into end-use products with food uses.

TRB has been requested to evaluate the product chemistry data required for the registration of the proposed alternate MUP.

SUMMARY OF FINDINGS:

1. The proposed alternate formulation contains one active ingredient Tebuconazole (97.0%), which was produced by integrated manufacturing process system at site [REDACTED]
2. The overall mean of the active ingredient from the five batch analysis is 98.92% [MRID 474917-03].
3. The nominal concentration of the active ingredient used in this formulation is 97.0%. This falls within the certified limits of the active ingredient of the basic product. The nominal concentration of the active ingredient matches with the label claim. This is in compliance with PR Notice 91-2. The certified limits for active and the impurities comply with 40 CFR§ 158.350 (b) (2).
4. The proposed alternate formulation complies with the 40 CFR § 152.43.
5. The CSF of the proposed MUP (dated 10/10/2008) is filled out completely and correctly. This CSF has been reviewed by I.I.A. Branch on 10/14/2008.

DP BARCODE No.: 355558 **EPA Reg. No.:** 69361-10 **PRODUCT NAME:** Tebuconazole Technical

6. The product chemistry data submitted for Group A corresponding to guidelines 830.1550 (product identity and composition), 830.1600 (description of materials used to produce the product), 830.1650 (description of formulation process), 830.1670 (discussion of formation of impurities), 830.1750 (certified limits) satisfy the product chemistry data requirements of 40 CFR §158.320, 158.325, 158.335, 158.340, and 158.350 respectively for the proposed formulation [MRID 474917-01].

7. Five batches of Tebuconazole Technical were analyzed for percent active ingredient by GC equipped with FID detector. The water content was determined by Karl Fischer Method. The impurities were quantified by GC-MS [MRID 474917-03].

Similar analytical techniques can also be applied for Enforcement Analytical Method.

8. Product chemistry Group A data requirements are satisfied [MRID: 474917-01].

9. Product chemistry Group B data is not required for alternate formulation.

10. Four impurities are common between the basic and the alternate formulations. Non-organic impurities have been reported in Alternate CSF which are not present in the basic CSF [see Page # 26].

CONCLUSIONS:

1. TRB has reviewed the CSF dated 10/10/2008 for the proposed alternate MUP, and has found it to be acceptable.

2. Product chemistry data requirements with respect to Group A and Group B for the proposed alternate are satisfied.

DP BARCODE No.: 355558 **EPA Reg. No.:** 69361-10 **PRODUCT NAME:** Tebuconazole Technical

PRODUCT CHEMISTRY DATA (SERIES 830 Group A)

Group A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (same as in proposed alternate CSF dated 10/10/2008)	A	474917-01
830.1600. Beginning Materials	A	474917-01
830.1620. Production process	A	474917-01
830.1650. Formulation process	N/A	
830.1670. Discussion of Impurities	A	474917-01
830.1700. Preliminary Analysis	A	474917-03
830.1750. Certified Limits (same as in alternate formulation dated 10/10/2008)	A	474917-01
830.1800. Enforcement Analytical Method	A	474362-02

A = Acceptable



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

11/A/4/1

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

August 19, 2008

OPP Decision Number: D-398151
EPA File Symbol or Registration Number: 69361-10
Product Name: TEBUCONAZOLE TECHNICAL
EPA Application Receipt Date: 29-Jul-2008
EPA Waiver Request Receipt Date: 29-Jul-2008
EPA Company Number: 69361
Company Name: REPAR CORP

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES
REPAR CORP
1730 M STREET, N.W., SUITE 906
WASHINGTON, DC 20036

SUBJECT: Approval of Waiver Request

Dear Registrant:

The Office of Pesticide Programs has approved your request for 75% waiver of the pesticide registration fee associated with the action referenced above. The decision review period for this action will begin on the date of this letter.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman, at (703) 305-6249.

Sincerely,

Oscar Morales, Director
Information Technology and Resources Management Division
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

5833400

August 1, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MANDAVA ASSOCIATES
REPAR CORP
1730 M STREET, N.W., SUITE 906
WASHINGTON, DC 20036

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 29-JUL-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

MANDAVA ASSOCIATES, LLC*CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS**1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512**TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com*

5833400

Hand Delivered

July 28, 2008

Ms. Mary Waller (PM 21)
Fungicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Alternate Source for TEBUCONAZOLE TECHNICAL
Active Ingredient: Tebuconazole
EPA Reg. No.: 69361-10

Registrant: Repar Corporation

Dear Ms. Waller:

Tebuconazole Technical (EPA Reg. No.: 69361-10) is registered by Repar Corporation ("Repar"). According to label ingredient statement, the purity of active ingredient is 97% in Tebuconazole Technical.

The registrant (Repar) is seeking an alternate source for tebuconazole technical and the producer for proposed alternate source is [REDACTED].
On behalf of Repar Corporation, we are submitting the Product Chemistry data in support of a **ME-TOO** application for the registration of TEBUCONAZOLE TECHNICAL.

In support of the alternate source for Tebuconazole Technical, we are providing the following administrative materials.

- 1) Application for Pesticide Registration
- 2) Registration Fee Waiver Request
- 3) Confidential Statement of Formula
- 4) Data Matrix

*Product Source Information May Be Entitled to
Confidential Treatment*

We are also submitting the product chemistry data in support of the alternate source for Tebuconazole Technical:

- 5) Volume 1: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-10); Repair Corporation
- 6) Volume 2A: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700-1900 (Project No.: REPAR-TEBU TECH-PC-11); Repair Corporation
- 7) Volume 2B: Purity Profile of Five Batches of Tebuconazole Technical. OPPTS Guidelines 830.1700 and 830.1800. Study No. A 3166; ANADIAG S.A.; [REDACTED]
- 8) Volume 3: TEBUCONAZOLE TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302-7950 (Project No.: Repair-TEBU TECH-PC-12); Repair Corporation

We have enclosed a copy of the approved label for Tebuconazole Technical (EPA Reg. No.: 69361-10) and the Confidential Statement of Formula (EPA Form 8570-4) for proposed alternate source product.

Since we unequivocally showed that, based on the product chemistry data, the proposed alternate source for Tebuconazole Technical is the same as or substantially similar to the registered Tebuconazole Technical (EPA Reg. No.: 69361-10), we request you to approve the proposed alternate source (alternate formulation). Thank you for your ready cooperation.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., CPC, RAC
Agent for Repair Corporation

Enclosure

Product ingredient source information may be entitled to confidential treatment

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Repar Corporation
c/o Mandava Associates
1730 M Street, NW, Suite 906
Washington, DC 20036

REGULATORY ACTION SUPPORTED BY THIS PACKAGE:

FIFRA Registration Application for:

Product Name:	TEBUCONAZOLE TECHNICAL
Active Ingredient:	Tebuconazole
Active Ingredient No.:	128997
Company Name:	Repar Corporation.
EPA Company Number:	69361
EPA Registration No.:	69361-10

TRANSMITTAL DATE:

July 28, 2008

LIST OF SUBMITTED STUDIES:

- 47491701 1) Volume 1: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-10); Repar Corporation
- 47491702 2) Volume 2A: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700-1900 (Project No.: REPAR-TEBU TECH-PC-11); Repar Corporation
- 47491703 3) Volume 2B: Purity Profile of Five Batches of Tebuconazole Technical. OPPTS Guidelines 830.1700 and 830.1800. Study No. A 3166; ANADIAG S.A.; [REDACTED]

Product ingredient source information may be entitled to confidential treatment

47491704 4) Volume 3: TEBUCONAZOLE TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302-7950 (Project No.: Repar-TEBU TECH-PC-12); Repar Corporation

COMPANY OFFICIAL:

N. Bhushan Mandava

N. Bhushan Mandava
Registration Agent for Repar Corporation

COMPANY CONTACT:

N. Bhushan Mandava
Mandava Associates
1730 M Street, N.W., Suite 906
Washington, D.C. 20036
(202) 223-1424

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 7/31/08

Experts In-Processing Signature: [Signature]

Date 8/6/08

Fee Paid: Yes L

Division management contacted on issues No Yes

Date 8/6/08

EPA Reg. Number: <u>69310-10</u>		EPA Receipt Date: <u>7/29/08</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			<input checked="" type="checkbox"/>		
	a) All inerts, except fragrances, approved for food and non food proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
	Certificate and data matrix consistent			<input checked="" type="checkbox"/>		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					<input checked="" type="checkbox"/>
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	<input checked="" type="checkbox"/>				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged)					<input checked="" type="checkbox"/>
7	Is the data package consistent with PR Notice 86-5			<input checked="" type="checkbox"/>		
8	Notice of Filing (link to included with petitions)					

9	If applicable for conventional applications, reduced risk rationale			
	Required Data and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

* N/A – Not Applicable

Footnotes

A. This consideration does not apply to PRIA applications that include a request to approve an inert in the fee category. For these PRIA actions, information needs to be submitted to enable the Agency to review the inert approval request and will be a subject of the 21 day content screen. For other types of actions and for fragrances, the answer is only for the Agency's information and current policies, processes, and procedures should be consulted. This worksheet will be updated in the future to be consistent with current policies.

If brand, trade, or proprietary names are being used for some inert ingredients listed on the CSF, alternate names or additional information on the nature of the ingredient(s) should be provided to allow the Agency to determine whether the inert has been approved.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Refer to the list of data requirements. Biopesticide applicants were advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

MANDAVA ASSOCIATES, LLC*CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS**1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512**TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com*Hand Delivered

5833400

July 28, 2008

Ms. Mary Waller (PM 21)
Fungicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Alternate Source for TEBUCONAZOLE TECHNICAL
Active Ingredient: Tebuconazole
EPA Reg. No.: 69361-10

Registrant: Repar Corporation

Dear Ms. Waller:

Tebuconazole Technical (EPA Reg. No.: 69361-10) is registered by Repar Corporation ("Repar"). According to label ingredient statement, the purity of active ingredient is 97% in Tebuconazole Technical.

The registrant (Repar) is seeking an alternate source for tebuconazole technical and the producer for proposed alternate source is [REDACTED]
On behalf of Repar Corporation, we are submitting the Product Chemistry data in support of a **ME-TOO** application for the registration of TEBUCONAZOLE TECHNICAL.

In support of the alternate source for Tebuconazole Technical, we are providing the following administrative materials.

- 1) Application for Pesticide Registration
- 2) Registration Fee Waiver Request
- 3) Confidential Statement of Formula
- 4) Data Matrix

*Product Source information May be Entitled to
Confidential Treatment*

We are also submitting the product chemistry data in support of the alternate source for Tebuconazole Technical:

- 5) Volume 1: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-10); Repair Corporation
- 6) Volume 2A: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700-1900 (Project No.: REPAR-TEBU TECH-PC-11); Repair Corporation
- 7) Volume 2B: Purity Profile of Five Batches of Tebuconazole Technical. OPPTS Guidelines 830.1700 and 830.1800. Study No. A 3166; ANADIAG S.A.; [REDACTED]
- 8) Volume 3: TEBUCONAZOLE TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302-7950 (Project No.: Repair-TEBU TECH-PC-12); Repair Corporation

We have enclosed a copy of the approved label for Tebuconazole Technical (EPA Reg. No.: 69361-10) and the Confidential Statement of Formula (EPA Form 8570-4) for proposed alternate source product.

Since we unequivocally showed that, based on the product chemistry data, the proposed alternate source for Tebuconazole Technical is the same as or substantially similar to the registered Tebuconazole Technical (EPA Reg. No.: 69361-10), we request you to approve the proposed alternate source (alternate formulation). Thank you for your ready cooperation.

Sincerely,

N. Bhushan Mandava

N. Bhushan Mandava, Ph.D., CPC, RAC
Agent for Repair Corporation

Enclosure

Product ingredient source information may be entitled to confidential treatment

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Repar Corporation
c/o Mandava Associates
1730 M Street, NW, Suite 906
Washington, DC 20036

REGULATORY ACTION SUPPORTED BY THIS PACKAGE:

FIFRA Registration Application for:

Product Name:	TEBUCONAZOLE TECHNICAL
Active Ingredient:	Tebuconazole
Active Ingredient No.:	128997
Company Name:	Repar Corporation.
EPA Company Number:	69361
EPA Registration No.:	69361-10

TRANSMITTAL DATE:

July 28, 2008

LIST OF SUBMITTED STUDIES:

- 47491701** 1) Volume 1: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-10); Repar Corporation
- 47491702** 2) Volume 2A: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700-1900 (Project No.: REPAR-TEBU TECH-PC-11); Repar Corporation
- 47491703** 3) Volume 2B: Purity Profile of Five Batches of Tebuconazole Technical. OPPTS Guidelines 830.1700 and 830.1800. Study No. A 3166; ANADIAG S.A.; [REDACTED]
[REDACTED]

Product ingredient source information may be entitled to confidential treatment

- 47491704 4) Volume 3: TEBUCONAZOLE TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302-7950 (Project No.: Repar-TEBU TECH-PC-12); Repar Corporation

COMPANY OFFICIAL:

N. Bhushan Mandava

N. Bhushan Mandava
Registration Agent for Repar Corporation

COMPANY CONTACT:

N. Bhushan Mandava
Mandava Associates
1730 M Street, N.W., Suite 906
Washington, D.C. 20036
(202) 223-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 31, 2008

D 39815 2

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-398151
EPA File Symbol or Registration Number: 69361-10
Product Name: TEBUCONAZOLE TECHNICAL
EPA Receipt Date: 29-Jul-2008
EPA Company Number: 69361
Company Name: REPAR CORP

N. BHUSHAN MADAVA
MANDAVA ASSOCIATES
REPAR CORP
1730 M STREET, N.W., SUITE 906
WASHINGTON, DC 20036

SUBJECT: Receipt of Amendment and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your amendment, 75% small business waiver request, and certification of payment. If you submitted data with this amendment, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMENTS; SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,

Teresa Downs

Front End Processing Staff
Information Technology & Resources Management Division



"Bhushan Mandava"
<mandava@compuserve.com>
>

07/31/2008 08:35 AM

To Teresa Downs/DC/USEPA/US@EPA

cc "Bhushan Mandava" <mandava@compuserve.com>

bcc

Subject RE: Underpayment of PRIA fee

Dear Teresa:

Attached please find a copy of the online payment of \$32.50 (balance of payment) for registration number 69361-10.

Please proceed with the processing of our submission.

Best Regards,

Bhushan

N. Bhushan Mandava
Mandava Associates, LLC
1730 M Street, N.W.
Suite 906
Washington, D.C. 20036
Tel: (202) 223 - 1424
Fax: (202) 223 - 0141

-----Original Message-----

From: Bhushan Mandava
Sent: Wednesday, July 30, 2008 4:29 PM
To: Downs.Teresa@epamail.epa.gov
Cc: Bhushan Mandava
Subject: RE: Underpayment of PRIA fee

Dear Teresa:

Thanks. We will be sending the balance of the payment.

Sincerely,

Bhushan

N. Bhushan Mandava
Mandava Associates, LLC
1730 M Street, N.W.
Suite 906
Washington, DC 20036
Tel: (202) 223 - 1424
Fax: (202) 223 - 0141

-----Original Message-----

From: Downs.Teresa@epamail.epa.gov [mailto:Downs.Teresa@epamail.epa.gov]

Sent: Wednesday, July 30, 2008 2:26 PM

To: Bhushan Mandava

Subject: Underpayment of PRIA fee

The amendment submitted on behalf of registration number 69361-10 on July 29, 2008 was underpaid by \$32.50. The action code is R340 which has a fee of \$3,280. Since a 75% small business waiver was requested the amount due is 25% of \$3,280, which equals \$820. Please email me a copy of a check or a pay.gov receipt for the amount of the underpayment.

Teresa Downs

Information Services Branch
Office of Pesticide Programs
U.S. Environmental Protection Agency
phone: (703)305-5363
fax: (703)305-7670
Visit <http://www.epa.gov/pesticides>



PRIA - On-line payment of the fee - 07-31-08.pdf

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 24USEQ7H

Agency Tracking ID: 74050922738

Transaction Date and Time: 07/31/2008 07:57 EDT

Payment Summary

Address Information

Account Holder Naga Bhushan
Name: Mandava

15404 Tindlay

Billing Address: Street

Billing Address

2:

City: Silver Spring

State / Province: MD

Zip / Postal
Code: 20905

Country: USA

Account Information

American

Card Type: Express

Card Number: *****4009

Expiration Date: 10 / 2009

Decision

Number:

Registration
Number: 69361-10

Payment Information

Payment Amount: \$32.50

Transaction Date 07/31/2008
and Time: 07:57 EDT

Released
~~ON HOLD~~

**Pending receipt of certification of PRIA fee
payment**

Date placed on hold: 7/30/08
Date released: 7/31/08

Receipt: S- 833400
File Symbol/Reg. #: 69361-10

Registrant contact information:

Name: Dr. Mandava

Phone/Email address: 202-223-~~8123~~1424

mandava@compuserve.com

Notes: Underpaid by \$32.50
7/30/08 Sent e-mail

Information Services Branch point of contact: Teresa Downs, S-6922, (703)305-5363

Fee for Service

W
833400b~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☒ Studies? ☒ Fee Waiver?

☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.

21

Receipt No.

S-

833400

EPA File Symbol/Reg. No.

69361-10

Pin-Punch Date:

7/29/2008

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R340

Granted:

R340

Amount Due: \$ 3,280

Parent/Child Decisions:

☒ Technical + Impurities only - No inerts for review
☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product 3/6/08

Reviewer: Maignan

Date: 7-30-08

Remarks:

Registrant requested 75% fee waiver.

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com

Hand Delivered

July 28, 2008

Ms. Mary Waller (PM 21)
Fungicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Registration Fee Waiver
Request Waiver for Registration Fees as Small Business
Product Name: Tebuconazole Technical
EPA Reg. No.: 69361-10

Company Name: Repar Corporation
Company Number: 69361

Dear Ms. Waller:

We are submitting the Application for Registration (EPA Form 8570-1). On this form, we have indicated that we are submitting a fee waiver request as small business.

On January 3, 2008, the Agency granted our request for approval of 75% waiver of the pesticide registration fee for Repar Corporation as Small Business.

The OPP Decision Number is **D-387211**.

We identified the Action Code for Alternate Source is **R34**.

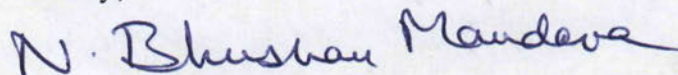
We have enclosed a check for \$787.50. (check #1754)

We have enclosed a copy of our previous correspondence with the Agency for your reference.

We now request the Agency to consider granting the 75% fee waiver for the subject product as small business.

If there are further questions, please contact us at the above address.

Sincerely,



N. Bhushan Mandava
Agent for Repar Corporation

Enclosure

REPAR CORPORATION

Environmental Protection Agency

1754

Check Number: 1754

Check Date: Jul 28, 2008

Check Amount: \$787.50

Item to be Paid - Description

Discount Taken

Amount Paid

Request for fee waiver

787.50

REPAR CORPORATION

15404 TINDLAY STREET
SILVER SPRING, MD 20905

BANK OF AMERICA

7-163/520

1754

Jul 28, 2008

Memo: EPA Reg. No 69361-10

DATE

*****AMOUNT
\$787.50

PAY Seven Hundred Eighty-Seven and 50/100 Dollars

TO THE ORDER OF
Environmental Protection Agency
Headquarters Acct. Operations
P. O. Box 952491
St. Louis, MO 63195-2491



Leslie K. Henderson

AUTHORIZED SIGNATURE

⑈001754⑈

*Commercial/Financial Information May be Entitled
to Confidential Treatment*



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 69361-10	2. EPA Product Manager Mary Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Repar Tebuconazole Technical	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Repar Corporation P.O. Box 4321 Silver Spring, MD 20914 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

- 1) This application is for the approval of alternate source of Repar Tebuconazole Technical (EPA Reg. No. 69361-10) and includes fee waiver request.
2) Submittal of Product Chemistry data on Tebuconazole Technical from [REDACTED] which is proposed to be used as the alternate source.
3) The action code for this request is R34. 4) Please direct all correspondence to: Mandava Associates, LLC; 1730 M Street, NW / Suite 906; Washington, D.C. 20036. 5) The contact person fax number is (202) 223 - 0141 and e-mail address is: mandava@compuserve.com.

Product ingredient source information may be entitled to confidential treatment**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 20 kg, 50 Kg		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name N. Bhushan Mandava		Title Agent for Repar Corporation		Telephone No. (Include Area Code) 202-223-1424	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
2. Signature N. Bhushan Mandava		3. Title Agent for Repar Corporation		6. Date Application Received (Stamped)	
4. Typed Name N. Bhushan Mandava		5. Date July 22, 2008			

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS

1730 M STREET, N.W., SUITE 906, WASHINGTON, DC 20036-4512

TELEPHONE: (202)-223-1424/1747 · TELEFAX: (202)-223-0141 · E-Mail: mandava@compuserve.com

Hand Delivered

July 28, 2008

Ms. Mary Waller (PM 21)
Fungicide Branch
Registration Division (7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, D.C. 20460

SUBJECT: Alternate Source for TEBUCONAZOLE TECHNICAL
Active Ingredient: Tebuconazole
EPA Reg. No.: 69361-10

Registrant: Repar Corporation

Dear Ms. Waller:

Tebuconazole Technical (EPA Reg. No.: 69361-10) is registered by Repar Corporation ("Repar"). According to label ingredient statement, the purity of active ingredient is 97% in Tebuconazole Technical.

The registrant (Repar) is seeking an alternate source for tebuconazole technical and the producer for proposed alternate source is [REDACTED]. On behalf of Repar Corporation, we are submitting the Product Chemistry data in support of a ME-TOO application for the registration of TEBUCONAZOLE TECHNICAL.

In support of the alternate source for Tebuconazole Technical, we are providing the following administrative materials.

- 1) Application for Pesticide Registration
- 2) Registration Fee Waiver Request
- 3) Confidential Statement of Formula
- 4) Data Matrix

Product Source Information May be Entitled to Confidential Treatment

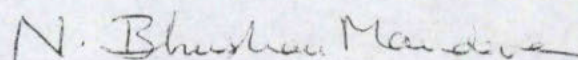
We are also submitting the product chemistry data in support of the alternate source for Tebuconazole Technical:

- 5) Volume 1: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-10); Repair Corporation
- 6) Volume 2A: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700-1900 (Project No.: REPAR-TEBU TECH-PC-11); Repair Corporation
- 7) Volume 2B: Purity Profile of Five Batches of Tebuconazole Technical. OPPTS Guidelines 830.1700 and 830.1800. Study No. A 3166; ANADIAG S.A.; [REDACTED]
- 8) Volume 3: TEBUCONAZOLE TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302-7950 (Project No.: Repair-TEBU TECH-PC-12); Repair Corporation

We have enclosed a copy of the approved label for Tebuconazole Technical (EPA Reg. No.: 69361-10) and the Confidential Statement of Formula (EPA Form 8570-4) for proposed alternate source product.

Since we unequivocally showed that, based on the product chemistry data, the proposed alternate source for Tebuconazole Technical is the same as or substantially similar to the registered Tebuconazole Technical (EPA Reg. No.: 69361-10), we request you to approve the proposed alternate source (alternate formulation). Thank you for your ready cooperation.

Sincerely,



N. Bhushan Mandava, Ph.D., CPC, RAC
Agent for Repair Corporation

Enclosure

Product ingredient source information may be entitled to confidential treatment

TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Repar Corporation
c/o Mandava Associates
1730 M Street, NW, Suite 906
Washington, DC 20036

REGULATORY ACTION SUPPORTED BY THIS PACKAGE:

FIFRA Registration Application for:

Product Name:	TEBUCONAZOLE TECHNICAL
Active Ingredient:	Tebuconazole
Active Ingredient No.:	128997
Company Name:	Repar Corporation.
EPA Company Number:	69361
EPA Registration No.:	69361-10

TRANSMITTAL DATE:

July 28, 2008

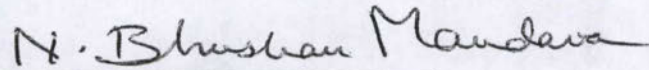
LIST OF SUBMITTED STUDIES:

- 1) Volume 1: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.300-355; OPPTS Test Guidelines 830.1000-1900 (Project No.: REPAR-TEBU TECH-PC-10); Repar Corporation
- 2) Volume 2A: TEBUCONAZOLE TECHNICAL: Group A - Product Identity, Composition, and Analysis. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.345-355; OPPTS Test Guidelines 830.1700-1900 (Project No.: REPAR-TEBU TECH-PC-11); Repar Corporation
- 3) Volume 2B: Purity Profile of Five Batches of Tebuconazole Technical. OPPTS Guidelines 830.1700 and 830.1800. Study No. A 3166; ANADIAG S.A.; [REDACTED]

Product ingredient source information may be entitled to confidential treatment

- 4) Volume 3: TEBUCONAZOLE TECHNICAL: Group B - Physical and Chemical Properties. Product Properties Data in Support of FIFRA Registration. Data Requirement: 40 CFR 158.310; OPPTS Test Guidelines 830.6302-7950 (Project No.: Repar-TEBU TECH-PC-12); Repar Corporation

COMPANY OFFICIAL:



N. Bhushan Mandava
Registration Agent for Repar Corporation

COMPANY CONTACT:

N. Bhushan Mandava
Mandava Associates
1730 M Street, N.W., Suite 906
Washington, D.C. 20036
(202) 223-1424



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Repar Corporation P.O. Box 4321 Silver Spring, MD 20914; (202) 223-1424	EPA Registration Number/File Symbol 69361-10
Active Ingredient(s) and/or representative test compound(s) Tebuconazole (CAS# 107534-96-3)	Date July 22, 2008
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Fungicide, Insecticide, Terrestrial, Food Crops	Product Name Repar Tebuconazole Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. If I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>N. Bhushan Mandava</i>	Date July 22, 2008	Typed or Printed Name and Title N. Bhushan Mandava, Agent for Repar Corporation
--	-----------------------	--



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date July 22, 2008			EPA Reg No./File Symbol 69361-10		Page 1 of 13
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	47301201	Repar Corporation	OWN	
			P.O. Box 4321 Silver Spring, MD 20914		
830.1600	Description of Materials Used to Produce the Product	47301201	Repar Corporation	OWN	
830.1620	Description of Production Process		Repar Corporation		Not Required
830.1650	Description of Formulation Process	47301201	Repar Corporation	OWN	
830.1670	Discussion of Formation of Impurities	47301201	Repar Corporation	OWN	
830.1700	Preliminary Analysis	47301201	Repar Corporation	OWN	
830.1750	Certified Limits	47301201	Repar Corporation	OWN	
830.1800	Enforcement Analytical Method	47301201	Repar Corporation	OWN	
830.6302	Color	47301201	Repar Corporation	OWN	
830.6303	Physical State	47301201	Repar Corporation	OWN	
830.6304	Odor	47301201	Repar Corporation	OWN	
830.6313	Stability to Normal & Elevated Temperatures, Metals		Repar Corporation		Not Required
	and Metal Ions				
830.6314	Oxidation/Reduction: Chemical Incompatibility		Repar Corporation		Not Required
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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DATA MATRIX

Date July 22, 2008			EPA Reg No./File Symbol 69361-10		Page 2 of 13
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability		Repar Corporation		Not Required
830.6316	Explosibility		Repar Corporation		Not Required
830.6317	Storage Stability	47016901	Repar Corporation	OWN	
830.6319	Miscibility	47016901	Repar Corporation	OWN	
830.6320	Corrosion Characteristics	47016901	Repar Corporation	OWN	
830.6321	Dielectric Breakdown Voltage		Repar Corporation		Not Required
830.7000	pH	47016901	Repar Corporation	OWN	
830.7050	UV/Visible Absorption		Repar Corporation		Not Required
830.7100	Viscosity	47016901	Repar Corporation	OWN	
830.7200	Melting Point/Melting Range		Repar Corporation		Not Required
830.7220	Boiling Point/Boiling Range		Repar Corporation		Not Required
830.7300	Density/Relative Density/Bulk Density	47016901	Repar Corporation	OWN	
830.7370	Dissociation Constants in Water		Repar Corporation		Not Required
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method		Repar Corporation		Not Required
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water),	47016901	Repar Corporation		Not Required
	Generator Column Method				
830.7570	Partition Coefficient (n-octanol/water),	47016901	Repar Corporation		See 830.7550
	Estimation by Liquid Chromatography				
830.7840	Water Solubility: Column Elution Method;	47016901	Repar Corporation	OWN	
	Shake Flask Method				
830.7860	Water Solubility, Generator Column Method	47016901	Repar Corporation		See 830.7840
830.7950	Vapor Pressure	47016901	Repar Corporation		Not Required
Acute Toxicology Studies					
870.1100	Acute Oral Toxicity		CITE ALL		
870.1200	Acute Dermal Toxicity		CITE ALL		
870.1300	Acute Inhalation Toxicity		CITE ALL		
870.2400	Acute Eye Irritation		CITE ALL		
870.2500	Acute Dermal Irritation		CITE ALL		
870.2600	Skin Sensitization		CITE ALL		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008



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Date July 22, 2008			EPA Reg No./File Symbol 69361-10		Page 4 of 13
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Bayer CropScience, LP 2 T.W. Alexander Drive	Pay	
CITE-ALL			Research Triangle Park, NC 27709 (CO.#264)		
			Bayer Environmental Science	Pay	
			A Business Group of Bayer CropScience, LP		
			P.O. Box 12014		
			RTP, NC 27709 (Company # 432)		
			Osmose, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 3008)		
			Bayer Corp	Pay	
			P.O. Box 4913		
			Kansas City, MO 641200013(Company # 3125)		
			Cerexagri, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 4581)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product Repar Tebuconazole Technical			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Cheminova, Inc.	Pay	
CITE-ALL			Agent for: Cheminova A/S		
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 4787)		
			Gustafson, LLC	Pay	
			P.O. Box 660065		
			Dallas, TX 75266 (Company # 7501)		
			SCIREG, INC.	Pay	
			Agent for: J.J. Mauget Co.		
			12733 Director's Loop		
			Woodbridge, VA 22192 (Company # 7946)		
			Chemical Specialities, Inc.	Pay	
			One Woodlawn Green 350		
			Charlotte, NC 28217 (Company # 10465)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product Repar Tebuconazole Technical			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			CP Chemicals, Inc.	Pay	
CITE-ALL			Attn: Ronald Miller		
			65 Challenger Road, 3rd Floor		
			Ridgefield Park, NJ 07660 (Company # 11435)		
			Makhteshim-Agan of North America, Inc.	Pay	
			Agent for: Makhteshim Chemicals Works Ltd.		
			4515 Falls of Neuse Rd., Suite 300		
			Raleigh, NC 27609 (Company # 11678)		
			Loveland Products, Inc.		
			P.O. Box 1286		
			Greeley, CO 80632 (Company # 34704)		
			Lanxess Corporation	Pay	
			111 RIDC Park West Drive		
			Pittsburgh, PA 15275 (Company # 39967)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Luxembourg-Pamol, Inc.	Pay	
CITE-ALL			5100 Poplar Avenue Suite 2700		
			Memphis, TN 38137 (Company # 42519)		
			Albaugh, Inc.	Pay	
			Agent for: Albaugh, Inc.		
			P.O. Box 2127		
			Valdosta, GA 31604 (Company # 42750)		
			BASF Sparks, LLC	Pay	
			P.O Box 13528		
			RTP, NC 27709 (Company # 51036)		
			KOP-COAT, Inc.	Pay	
			436 Seventh Avenue		
			Pittsburgh, PA 15219 (Company # 60061)		
			Sipcam Agro USA, Inc. 300 Colonial Pkwy,	Pay	
			Ste 230 Roswell, GA 30076 (Company # 60063)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product Repar Tebuconazole Technical			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Arch Wood Protection, Inc.	Pay	
CITE-ALL			1955 Lake Park Drive, Suite 250		
			Smyrna, GA 30080 (Company # 62190)		
			Makhteshim-Agan of North America, Inc.	Pay	
			4515 Falls of Neuse Road, Suite 300		
			Raleigh, NC 27609 (Company # 66222)		
			Arysta LifeScience of North America Corp.	Pay	
			15401 Weston Parkway, Suite 150		
			Cary, NC 27513 (Company # 66330)		
			Spray Drift Task Force	Pay	
			1900 K Street, NW		
			Washington, DC 20006 (Company # 66607)		
			Cheminova, Inc.	Pay	
			1700 Route 23 - Ste 300		
			Wayne, NJ 07470		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Mandava Associates	Pay	
CITE-ALL			Agent for: Repar Corporation		
			1730 M Street, N.W., Suite 906		
			Washington, DC 20036 (Company # 69361)		
			United Phosphorus, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 70506)		
			Outdoor Residential Exposure Task Force, LLC	Pay	
			1350 I Street, N.W.		
			Washington, D.C. 20005 (Company # 71754)		
			Agricultural Reentry Task Force	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company # 71755)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product Repar Tebuconazole Technical		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Bayer Advanced	Pay	
CITE-ALL			A Business Unit of Bayer CropScience LP		
			PO Box 12014		
			RTP, NC 27709 (Company # 72155)		
			FIFRA Endangered Species Task Force, L.L.C.	Pay	
			1350 I Street, NW		
			Washington, DC 20005 (Company # 73989)		
			Mandava Associates	Pay	
			Agent for: Punjab Chemicals & Crop Protection		
			1730 M Street, N.W., Suite 906		
			Washington, DC 20036 (Company # 74280)		
			Osmose New Zealand	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 74405)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Arch Wood Protection, Inc.	Pay	
CITE-ALL			Agent for: Koppers Arch Wood Protection		
			1955 Lake Park Drive, Suite 100		
			Smyrna, GA 30080 (Company # 75101)		
			Agricultural Handlers Exposure Task Force	Pay	
			PO Box 509		
			Macon, MO 63552 (Company # 75234)		
			Osmose Utilities Services, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 75341)		
			Arch Treatment Technologies, Inc.	Pay	
			1955 Lake Park Drive		
			Smyrna, GA 30080 (Company # 75506)		
			U.S. Triazole Task Force 600 13th Street, 12th	Pay	
			Floor Washington, DC 20005 (CO # 75576)		
Signature N. Bhushan Mandava			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			Nufarm Americas, Inc.	Pay	
CITE-ALL			AGT Division		
			150 Harvester Drive Suite 200		
			Burr Ridge, IL 60527 (Company # 55146)		
			IPM Resources LLC	Pay	
			Agent for: Rotam Ltd.		
			660 Newton-Yardley Rd., Suite 105		
			Newton, PA 18940 (Company # 81598)		
			Syntech Global LLC	Pay	
			Agent for: Sharda Worldwideexports Pvt.		
			PO Box 640		
			Hockessin, DE 19707 (Company # 82633)		
			Generic Endangered Species Task Force	Pay	
			(GESTF) 500 Eighth Street, N.W.		
			Washington, DC 20004 (Company # 84653)		
Signature <i>N. Bhushan Mandava</i>		Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008	



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Generic Data			C/O IPM Resources, LLC	Pay	
CITE-ALL			Agent for: Rotam Agrichemical Co., Ltd.		
			660 Newton-Yardley Rd, Suite 105		
			Newton, PA 18940 (Company # 83100)		
			Syntech Global LLC	Pay	
			Agent for: Sharda USA LLC		
			PO Box 640		
			Hockessin, DE 19707 (Company # 83529)		
			Amtide, LLC	Pay	
			21 Hubble		
			Irvine, CA 92618 (Company # 83851)		
			Pyxis Regulatory Consulting, Inc.	Pay	
			Agent for: GRO-PRO, LLC		
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company # 79676)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date July 22, 2008

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TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4--triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<ul style="list-style-type: none"> ● Move person to fresh air. ● If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible. ● Call a poison control center or physician for treatment advice.
If swallowed:	<ul style="list-style-type: none"> ● Call a physician or poison control center immediately for treatment advice ● Have person sip a glass of water if able to swallow. ● DO NOT induce vomiting unless told to do so by a poison control center or physician. ● Do not give anything by mouth to an unconscious person.
If on skin or : clothing	<ul style="list-style-type: none"> ● Take off contaminated clothing. ● Rinse skin with plenty of water for 15-20 minutes. ● Call a poison control center or physician for treatment advice.
If in eyes:	<ul style="list-style-type: none"> ● Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes. ● Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye ● Call a poison control center or physician for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<p>Note to Physician: No specific antidote is available. Treat symptomatically.</p>	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Bananas, Plantains, Cherries, Nectarines, Peaches, Grapes, ~~Oats~~, Peanuts, Pistachios, and Grasses grown for seed.

Terrestrial Food Crops – Seed Treatment: Barley, ^{oats} and Wheat

Terrestrial Food Crops - Foliar Treatment: Barley, ^{oats} and Wheat

Terrestrial Non-Food Crops: Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products, wood products intended for above ground and in-ground contact, plastics, coatings, and ~~paint systems for in-film~~ preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodeterioration.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such use.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. The dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

Material Sent for Data Extraction

Reg. # 69361-10

Description: Revised label

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 6-26-08

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: 396169

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: ROBERT WESTIN

Phone: 305-5721 Division: RD/FB

Date: 6-26-2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

ATTACHMENT 1

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Repar Corporation
% N. Bushan Mandava
Mandava Associates, LLC
1730 M Street N.W., Suite 906
Washington, DC 20036-4510

JUN 26 2008

Subject: Tebuconazole Technical
EPA Reg. No. 69361-10
Your amendment dated June 24, 2008
EPA Decision Number 369169

Dear Mr. Mandava:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided that you make the following change to the label:

In the **Directions for Use** under the heading **Terrestrial Non-Food**, delete "and paint systems for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodeterioration."

As a condition of registration, you must submit or cite data to satisfy the following data gaps in the timeframe specified below:

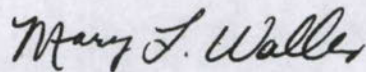
1. Submit barley field trial data from regions 10 and 11 (along with concurrent storage stability data on barley straw). Submission Due by: December 2011
2. Comply in the timeframe specified with the future Agency Data Call-in for all triazole-derivative active ingredients.
3. Submit a Whole Sediment Toxicity Study for benthic invertebrates. Submission due by: December 2011.
4. Submit Aerobic and Anaerobic Aquatic Metabolism Studies. Submission due by: December 2011.

" Attachment 1 "

EPA Reg. No.
Product Name
Page 2 of 2

One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment. If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)

Enclosure

TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-
1H-1,2,4-triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If inhaled:	<p>! Move person to fresh air.</p> <p>! If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.</p> <p>! Call a poison control center or physician for treatment advice.</p>
If swallowed:	<p>! Call a physician or poison control center immediately for treatment advice</p> <p>! Have person sip a glass of water if able to swallow.</p> <p>! DO NOT induce vomiting unless told to do so by a poison control center or physician.</p> <p>! Do not give anything by mouth to an unconscious person.</p>
If on skin or : clothing	<p>! Take off contaminated clothing.</p> <p>! Rinse skin with plenty of water for 15-20 minutes.</p> <p>! Call a poison control center or physician for treatment advice.</p>
If in eyes:	<p>! Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.</p> <p>! Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye</p> <p>! Call a poison control center or physician for treatment advice.</p>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: No specific antidote is available. Treat symptomatically.	

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
EPA Reg. No. 69361-10

Manufactured For:
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

ACCEPTED
with COMMENTS
In EPA Letter Dated:
6/26/2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

69361-10

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Bananas, Plantains, Cherries, Nectarines, Peaches, Oats, Peanuts, and Grasses grown for seed.

Terrestrial Food Crops - Seed Treatment: Barley and Wheat

Terrestrial Food Crops - Foliar Treatment: Barley and Wheat

Terrestrial Non-Food Crops: Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products, wood products intended for above ground and in-ground contact, plastics, coatings, and paint systems for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodeterioration.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such use.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food,

and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. The dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

Attachment 2

MANDAVA ASSOCIATES, LLC

CONSULTANTS IN SCIENCE, TECHNOLOGY AND REGULATORY AFFAIRS
1050 Connecticut Avenue, N.W., Suite 1000, WASHINGTON, DC 20036-4510
Telephone: (202)-223-1424/1747 · Fax: (202)-223-0141 · E-MAIL: Mandava@compuserve.com

October 6, 2008

Ms. Mary L. Waller
Product Manager (PM 21)
Fungicide Branch
Registration Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

SUBJECT:	Submission:	Amended Label
	Product Name:	Tebucon 3.6F Fungicide
	Active Ingredient:	Tebuconazole
	Company:	Repar Corporation
	EPA File Symbol:	69361-11

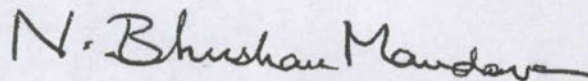
Dear Ms. Waller:

This is to notify the EPA that we are submitting 5 copies of the Amended Label for Tebucon 3.6F Fungicide (EPA Reg. No.: 69361-11). The product label was amended to include additional uses for terrestrial food crops, terrestrial food crops- seed treatment, and terrestrial food crops – foliar treatment.

As advised by your June 26, 2008 letter, we have revised the Tebuconazole Technical (EPA Reg. No.: 69361-10) label in the **Directions for Use** under the **Terrestrial Non-Food**, we have deleted “and paint systems for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodegradation.”

Thank you for your comments and assistance on this subject matter.

Sincerely,



N. Bhushan Mandava, Ph.D.
Agent for Repar Corporation

Enclosures

TEBUCONAZOLE TECHNICAL

Only For Use in the Manufacture of Fungicides

ACTIVE INGREDIENT:

Tebuconazole: α -[2-(4-chlorophenyl)ethyl]- α -(1,1-dimethylethyl)-

1H-1,2,4--triazole-1-ethanol 97.0%

INERT INGREDIENTS: 3.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING**FIRST AID**

If inhaled: ○Move person to fresh air.
 ○If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably, mouth-to-mouth, if possible.
 ○Call a poison control center or physician for treatment advice.

If swallowed: ○Call a physician or poison control center immediately for treatment advice
 ○Have person sip a glass of water if able to swallow.
 ○DO NOT induce vomiting unless told to do so by a poison control center or physician.
 ○Do not give anything by mouth to an unconscious person.

If on skin or: ○Take off contaminated clothing.
clothing ○Rinse skin with plenty of water for 15-20 minutes.
 ○Call a poison control center or physician for treatment advice.

If in eyes: ○Hold eye open and rinse slowly with a steady, gentle stream of water for 15-20 minutes.
 ○Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye
 ○Call a poison control center or physician for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Note to Physician: No specific antidote is available. Treat symptomatically.

Net Contents: 20 KG

EPA Est. No.: 84148-IND-001
 EPA Reg. No. 69361-10

Manufactured For:
 Repar Corporation
 P.O. Box 4321
 Silver Spring, MD 20914

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING

May be fatal if inhaled. Harmful if swallowed. Causes eye irritation.

Do not breathe dust and avoid contact with eyes or clothing. Wear a mask or pesticide respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to estuarine invertebrate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Terrestrial Food Crops: Asparagus, Bananas, Plantains, Barley, Beans, Cherries, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Mango, Okra, Fruit Nuts, Nectarines, Peaches, Grapes, Oats, Peanuts, Pistachios, Soybean, Sunflower, Turnips, Wheat.

Terrestrial Food Crops – Seed Treatment: Barley, Corn and Wheat.

Terrestrial Food Crops – Foliar Treatment: Asparagus, Barley, Beans, Corn, Cotton, Cucurbit Vegetables Crop, Garlic, Grasses Grown for Seed, Onions, Shallots, Scallions, Leek, Hops, Leafy Brassica Greens, Garden beet roots and tops, Lychee, Mango, Okra, Fruit Nuts, Peanuts, Soybean, Sunflower, Turnips, Wheat

Terrestrial Non-Food Crops: Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, Vines and Houseplants

Terrestrial Non-Food (Domestic Outdoor): For preservation of wood-based composite products and wood products intended for above ground and in-ground systems.

This product may be used to formulate for any additional uses not listed on this label if the formulator, user group, or grower has complied with EPA data requirements regarding the support of such uses.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Repar Corporation. Any variance from the federally registered labeling for end-use products containing Tebuconazole will have to be supported by data provided by the formulator.

RESTRICTIONS

Do not package Tebuconazole Technical in metal containers.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle an open container in a manner as to prevent spillage. If the container is leaking or material spilled for any reason or cause, carefully sweep material into a pile. Refer to Precautionary Statements on label for hazards associated with the handling of this materials. Do not walk through spilled materials. Dispose of pesticide as directed below. In spill or leak incidents, keep unauthorized people away. You may contact CHEMTREC at (800) 424-9300.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND WARRANTY

REPAR CORPORATION warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use herein described when used in accordance with the directions for use. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Repar Corporation. In no case shall Repar Corporation be liable for the consequential, special or indirect damages resulting from the handling or use of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Repar Corporation makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

Attachment 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ATTACHMENT 3

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAR 7 2011

Mr. N. Bhushan Mandava
Repar Corporation
P.O. Box 4321
Silver Spring, MD 20914

Subject: Tebucon 45 DF Fungicide
EPA Reg. No. 69361-18
Decision Number 444686
Your submission dated January 19, 2011

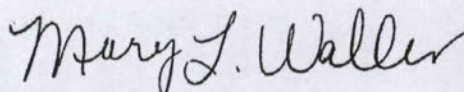
Dear Mr. Mandava:

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is not acceptable for the following reasons:

- 1) The last stamped label that the Agency has on file for the source of active ingredient in your product is dated June 26, 2008. The uses on the source label do not include the uses that you are proposing. Please ensure that the uses you wish to add to your product label are approved uses on your source product label. You must also submit a revised data matrix that addresses the specific data requirements for the added uses.
- 2) Additionally, it would appear that you have tried adding uses to the technical product by including "revised labels" in the submissions for other products, specifically in your letter of October 6, 2008 for EPA Reg. No. 69361-11 and with the present submission (EPA Reg. No. 69361-18, letter dated January 19, 2011). This is not acceptable. If you are updating the label for the technical product to include additional uses you must do so in a separate submission and address the data requirements for those additional uses.
- 3) As part of the new 40CFR §158 Guidelines, an immunotoxicity study in rats and/or mice is required. You must submit or cite this study by April 2012.

Please submit the required information listed above. If you have any questions, please contact Tracy Keigwin of my team by phone at 703-305-6605 or via email at keigwin.tracy@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Mary L. Waller". The signature is written in a cursive style with a large, stylized "M" and "W".

Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Repar Corporation P.O. Box 4321 Silver Spring, MD 20914; (202) 223-1424	EPA Registration Number/File Symbol 69361-10
Active Ingredient(s) and/or representative test compound(s) Tebuconazole (CAS# 107534-96-3)	Date March 9, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Fungicide, Terrestrial, Food Crops	Product Name TEBUCONAZOLE TECHNICAL

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
---	--

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>N. Bhusan Mandava</i>	Date March 9, 2011	Typed or Printed Name and Title N. Bhusan Mandava, Agent for Repar Corporation
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date March 9, 2011			EPA Reg No./File Symbol 69361-10		Page 1 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition		Repar Corporation	OWN	
			P.O. Box 4321 Silver Spring, MD 20914		
830.1600	Description of Materials Used to Produce the Product		Repar Corporation	OWN	
830.1620	Description of Production Process		Repar Corporation		Not Required
830.1650	Description of Formulation Process		Repar Corporation	OWN	
830.1670	Discussion of Formation of Impurities		Repar Corporation	OWN	
830.1700	Preliminary Analysis		Repar Corporation	OWN	
830.1750	Certified Limits		Repar Corporation	OWN	
830.1800	Enforcement Analytical Method		Repar Corporation	OWN	
830.6302	Color		Repar Corporation	OWN	
830.6303	Physical State		Repar Corporation	OWN	
830.6304	Odor		Repar Corporation	OWN	
830.6313	Stability to Normal & Elevated Temperatures, Metals and Metal Ions		Repar Corporation		Not Required
830.6314	Oxidation/Reduction: Chemical Incompatibility		Repar Corporation		Not Required
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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DATA MATRIX

Date March 9, 2011			EPA Reg No./File Symbol 69361-10		Page 2 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability		Repar Corporation		Not Required
830.6316	Explosibility		Repar Corporation		Not Required
830.6317	Storage Stability		Repar Corporation	OWN	
830.6319	Miscibility		Repar Corporation	OWN	
830.6320	Corrosion Characteristics		Repar Corporation	OWN	
830.6321	Dielectric Breakdown Voltage		Repar Corporation		Not Required
830.7000	pH		Repar Corporation	OWN	
830.7050	UV/Visible Absorption		Repar Corporation		Not Required
830.7100	Viscosity		Repar Corporation	OWN	
830.7200	Melting Point/Melting Range		Repar Corporation		Not Required
830.7220	Boiling Point/Boiling Range		Repar Corporation		Not Required
830.7300	Density/Relative Density/Bulk Density		Repar Corporation	OWN	
830.7370	Dissociation Constants in Water		Repar Corporation		Not Required
830.7550	Partition Coefficient (n-octanol/water),		Repar Corporation		Not Required
	Shake Flask Method				
Signature <i>N B Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method		Repar Corporation		Not Required
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography		Repar Corporation		See 830.7550
830.7840	Water Solubility: Column Elution Method; Shake Flask Method		Repar Corporation	OWN	
830.7860	Water Solubility, Generator Column Method		Repar Corporation		See 830.7840
830.7950	Vapor Pressure		Repar Corporation		Not Required
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

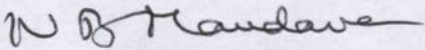


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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Bayer CropScience, LP 2 T.W. Alexander Drive	Pay	
			Research Triangle Park, NC 27709 (CO.#264)		
			Bayer Environmental Science	Pay	
			A Business Group of Bayer CropScience, LP		
			P.O. Box 12014		
			RTP, NC 27709 (Company # 432)		
			Osmose, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 3008)		
			Bayer Corp	Pay	
			P.O. Box 4913		
			Kansas City, MO 641200013(Company # 3125)		
			Cerexagri, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 4581)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Cheminova, Inc.	Pay	
			Agent for: Cheminova A/S		
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 4787)		
			Gustafson, LLC	Pay	
			P.O. Box 660065		
			Dallas, TX 75266 (Company # 7501)		
			J.J. Mauget Co.	Pay	
			12733 Director's Loop		
			Woodbridge, VA 22192 (Company # 7946)		
			Chemical Specialties, Inc.	Pay	
			One Woodlawn Green 350		
			Charlotte, NC 28217 (Company # 10465)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



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Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914		Product TEBUCONAZOLE TECHNICAL			
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			CP Chemicals, Inc.	Pay	
			Attn: Ronald Miller		
			65 Challenger Road, 3rd Floor		
			Ridgefield Park, NJ 07660 (Company # 11435)		
			Makhteshim-Agan of North America, Inc.	Pay	
			Agent for: Makhteshim Chemicals Works Ltd.		
			4515 Falls of Neuse Rd., Suite 300		
			Raleigh, NC 27609 (Company # 11678)		
			Loveland Products, Inc.	Pay	
			P.O. Box 1286		
			Greeley, CO 80632 (Company # 34704)		
			Lanxess Corporation	Pay	
			111 RIDC Park West Drive		
			Pittsburgh, PA 15275 (Company # 39967)		
Signature <i>N. B. Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

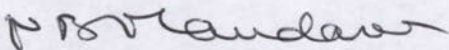


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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Luxembourg-Pamol, Inc.	Pay	
			5100 Poplar Avenue Suite 2700		
			Memphis, TN 38137 (Company # 42519)		
			Albaugh, Inc.	Pay	
			1525 NE 36th Street		
			Ankeny, IA 50021 (Company # 42750)		
			BASF Sparks, LLC	Pay	
			P.O Box 13528		
			RTP, NC 27709 (Company # 51036)		
			KOP-COAT, Inc.	Pay	
			436 Seventh Avenue		
			Pittsburgh, PA 15219 (Company # 60061)		
			Sipcam Agro USA, Inc. 2520 Meridian Pkwy.,	Pay	
			Ste 525 Durham, NC 27713 (Company # 60063)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Arch Wood Protection, Inc.	Pay	
			5660 New Northside Drive, Suite 1100		
			Atlanta, GA 30328 (Company # 62190)		
			Makhteshim-Agan of North America, Inc.	Pay	
			4515 Falls of Neuse Road, Suite 300		
			Raleigh, NC 27609 (Company # 66222)		
			Arysta LifeScience of North America Corp.	Pay	
			15401 Weston Parkway, Suite 150		
			Cary, NC 27513 (Company # 66330)		
			Spray Drift Task Force	Pay	
			1900 K Street, NW		
			Washington, DC 20006 (Company # 66607)		
			Cheminova, Inc.	Pay	
			1600 Wilson Blvd., Suite 700		
			Arlington, VA 22209 (Company # 67760)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

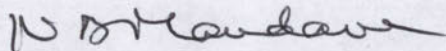


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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Mandava Associates	Pay	
			Agent for: Repar Corporation		
			1050 Connecticut Avenue, N.W., Suite 1000		
			Washington, DC 20036 (Company # 69361)		
			United Phosphorus, Inc.	Pay	
			630 Freedom Business Center, Suite 402		
			King of Prussia, PA 19406 (Company # 70506)		
			Outdoor Residential Exposure Task Force, LLC	Pay	
			1350 I Street, N.W.		
			Washington, D.C. 20005 (Company # 71754)		
			Agricultural Reentry Task Force	Pay	
			1350 I Street, N.W.		
			Washington, DC 20005 (Company # 71755)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

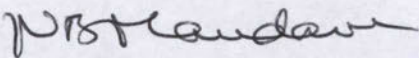


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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Bayer Advanced	Pay	
			A Business Unit of Bayer CropScience LP		
			PO Box 12014		
			RTP, NC 27709 (Company # 72155)		
			FIFRA Endangered Species Task Force, L.L.C.	Pay	
			1350 I Street, NW		
			Washington, DC 20005 (Company # 73989)		
			Punjab Chemicals & Crop Protection, Ltd.	Pay	
			10039 East Troon North Drive		
			Scottsdale, AZ 85262 (Company # 74280)		
			Osmose New Zealand	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 74405)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

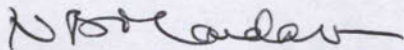


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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Arch Wood Protection (NZ) Limited	Pay	
			5660 New Northside Drive		
			Suite 1100		
			Atlanta, GA 30328 (Company # 75101)		
			Agricultural Handlers Exposure Task Force	Pay	
			PO Box 509		
			Macon, MO 63552 (Company # 75234)		
			Osmose Utilities Services, Inc.	Pay	
			980 Ellicott Street		
			Buffalo, NY 14209 (Company # 75341)		
			Arch Treatment Technologies, Inc.	Pay	
			5660 New Northside Drive, Suite 1100		
			Atlanta, GA 30328 (Company # 75506)		
			U.S. Triazole Task Force 600 13th Street, 12th	Pay	
			Floor Washington, DC 20005 (CO # 75576)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

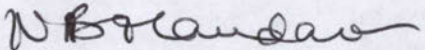


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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			GRO-PRO, LLC	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company # 79676)		
			Rotam Limited	Pay	
			4032 Crockers Lake Blvd., Ste 818		
			Sarasota, FL 43238 (Company # 81598)		
			Source Dynamics, LLC	Pay	
			10039 East Troon North Drive		
			Scottsdale, AZ 85262 (Company # 82542)		
			Sharda Worldwideexports Pvt., Ltd.		
			7460 Lancaster Pike, Suite 9		
			Hockessin, DE 19707 (Company # 82633)		
			Rotam Agrochemical Company Limited	Pay	
			4032 Crockers Lake Blve., Suite 818		
			Sarasota, FL 43238 (Company # 83100)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

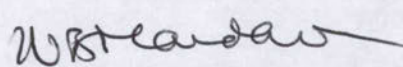


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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			J. Oliver Products, LLC	Pay	
			115 Obtuse Hill Road		
			Brookfield, CT 06804 (Company # 83222)		
			Sharda USA, LLC	Pay	
			7460 Lancaster Pike, Suite 9		
			Hockessin, DE 19707 (Company # 83529)		
			Amtide, LLC	Pay	
			21 Hubble		
			Irvine, CA 92618 (Company # 83851)		
			Generic Endangered Species Task Force	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company # 84653)		
			Phibro Wood, LLC	Pay	
			65 Challenger Road, Third Floor		
			Ridgefield Park, NJ 07660 (Company # 84661)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



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Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Trustchem Co., Ltd.	Pay	
			89 Hanzhang Road, D2, 23rd Floor		
			Nanjing 210019 (Company # 86296)		
			Berkem Developpement	Pay	
			149 East 36th Street		
			New York, NY 10016 (Company # 86505)		
			Willowood Propiconazole, LLC	Pay	
			4110 136th Street, N.W.		
			Gig Harbor, WA 98332 (Company # 87284)		
			Willowood, LLC	Pay	
			4110 136th Street, Northwest		
			Gig Harbor, WA 98332 (Company # 87290)		
			FMC Corp. Agricultural Products Group	Pay	
			1735 Market St., RM 1978		
			Philadelphia, PA 19103 (Company # 279)		
Signature <i>N. Bhushan Mandava</i>			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011

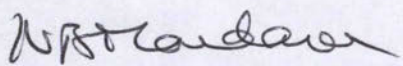


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Date March 9, 2011			EPA Reg No./File Symbol 69361-10		Page 15 of 15
Applicant's/Registrant's Name & Address Repar Corporation P.O. Box 4321 Silver Spring, MD 20914			Product TEBUCONAZOLE TECHNICAL		
Ingredient Tebuconazole (CAS# 107534-96-3)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
CITE-ALL			Nufarm Americas Inc.	Pay	
			150 Harvester Drive Suite 200		
			Burr Ridge, IL 60527 (Company # 55146)		
			Sulphur Mills, Ltd.	Pay	
			12208 Quinque Lane		
			Clifton, VA 20124 (Company # 70905)		
			Irvita Plant Protection N.V.	Pay	
			4515 Falls of Neuse Rd, Ste 300		
			Raleigh, NC 27609 (Company # 74054)		
Signature 			Name and Title N. Bhushan Mandava, Ph.D., Agent for Repar Corporation		Date March 9, 2011



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 69361-10	2. EPA Product Manager Mary Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Repar Corporation/TEBUCONAZOLE TECHNICAL	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Repar Corporation P.O. Box 4321 Silver Spring, MD. 20914 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

- 1) This application is for the amended labeling for TEBUCONAZOLE TECHNICAL (EPA Reg. No. 69361-10) and adding additional uses.
- 2) Submittal of the Certification with Respect to Citation of Data (EPA Form 8750 -34) and Data Matrix (EPA Form 8570 - 35).
- 3) FAST TRACK and EXPEDITED REVIEW
- 4) Please direct all correspondence to: Mandava Associates, LLC; 1050 Connecticut Avenue, NW / Suite 1000; Washington, D.C. 20036
- 5) The contact person fax number is (202) 223 - 0141 and e-mail address is: mandava@compuserve.com.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name N. Bhushan Mandava		Title Agent for Repar Corporation		Telephone No. (Include Area Code) (202) 223-1424	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature N. Bhushan Mandava		3. Title Agent for Repar Corporation			
4. Typed Name N. Bhushan Mandava		5. Date March 9, 2011			